

EXHIBIT C

MICRON CONSTRUCTIONS**Micron Defendants' Proposed Constructions of Disputed Claim Terms and Supporting Evidence****'912 Patent**

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
'912: All asserted claims	"rank"	<p>"an independent set of one or more memory devices on a memory module that act together in response to command signals, including chip select signals, to read or write the full bit-width of the memory module"</p> <p><u>Intrinsic Evidence</u></p> <p><u>U.S. Patent No. 7619912</u></p> <p>2:16-42; 2:59-3:14; 3:32-48; 6:31-38; 6:55-9:21; 10:31-55; 11:43-23:25; 23:60-24:38; 25:27-44; 32:27-38; Figs 1A, 1B, 2A, 2B, 3A, 3B, 11A, 11B.</p> <p>JEDEC standard JESD79D, "Double Data Rate (DDR) SDRAM Specification." published February 2004.</p> <p><u>File Histories</u>¹</p> <p>File histories of U.S. Patents: No. 7619912, No. 7286436, No. 7289386, No. 7532537, No. 7636274, No. 8154901, No. 8001434, No. 8417870, No. 7864627, No. 7881150, No. 8516185, No. 7965578, No. 8081535, No. 7916574, No. 7965579, No. 8072837, No. 8081536, No. 8081537, No. 8359501, No. 8756364, No. 8516188, No. 8787060, No. 8782350, No. 8689064, No. 9128632, No. 9606907, No. 9037774, No. 10217523, No.</p>

¹ Reference to a file history is intended to refer to all papers in the file history, including but not limited to non-final and final office actions, applicant/examiner interviews, terminal disclaimers, applicant responses to all office actions, amendments, and requests for continued examination.

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		<p>9037809, No. 9318160, No. 9858215, No. 9846659, No. 11093417, No. 10902886, No. 10860506, No. 10489314, No. 10268608, No. 10290328, No. 10949339, No. 9824035, No. 9659601, No. 9563587, No. 10025731, No. 61409893</p> <p>File histories of U.S. Patent Applications: No. 2022/0208233, No. 2021/0382834, No. 2021/0271593, No. 2021/0149829, No. 2019/0295675, No. 2021/0225415</p> <p><u>Inter Partes Reviews</u>²</p> <p>IPR2014-00882 (<i>see, e.g.</i>, POPR (Paper 9) at 5, 17), IPR2014-00883 (<i>see, e.g.</i>, POPR (Paper 8) at 5-7, 15; POR (Paper 25) at 26), IPR2014-00970, IPR2014-00971, IPR2014-01011, IPR2014-01029, IPR2014-01369, IPR2014-01370, IPR2014-01371, IPR2014-01372, IPR2014-01373, IPR2014-01374, IPR2014-01375, IPR2015-01020, IPR2015-01021, IPR2017-00548, IPR2017-00549, IPR2017-00560, IPR2017-00561, IPR2017-00562, IPR2017-00577, IPR2017-00587, IPR2017-00667, IPR2017-00668, IPR2017-00692, IPR2017-00730, IPR2018-00303, IPR2018-00362, IPR2018-00363, IPR2018-00364, IPR2018-00365, IPR2020-01042, IPR2020-01044, IPR2020-01421, IPR2022-00062, IPR2022-00063, IPR2022-00064, IPR2022-00236, IPR2022-00237, IPR2022-00615 (<i>see e.g.</i>, Paper 1 (Petition) at 11–14, 28–32, 38–51, 53–57, 74–77, 86–95, and 99–102, including all evidence cited therein; Paper 7 (POPR) at 28–34, 40–43, and 62–69, including all evidence cited therein, Paper 20 (Institution Decision) at 28–33, and 43–45, including all evidence cited therein), IPR2022-00639, IPR2022-00711, IPR2022-00744, IPR2022-00745, IPR2022-00996, IPR2022-00999, IPR2022-01427, IPR2022-01428, IPR2023-00203, IPR2023-00204, IPR2023-00205, IPR2023-00405, IPR2023-00406, IPR2023-00454, IPR2023-00455, IPR2023-00847, IPR2023-00883</p>

² Reference to an *Inter Partes* Review (IPR) is intended to refer to all papers associated with the IPR, including but not limited to the petition, patent owner preliminary response, patent owner response, petitioner reply, patent owner sur-reply, institution decision, final written decision, and all exhibits.

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		<p><u>Inter Partes Reexaminations</u>³</p> <p>No. 95/000546, No. 95/000577, No. 95/000578, No. 95/000579, No. 95/001337, No. 95/001339, No. 95/001381, No. 95/001758</p> <p><u>Federal Circuit Appeals</u>⁴</p> <p>No. 15-126, No. 15-1179, No. 16-1742 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-1743 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-1744 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-2274, No. 16-2666, No. 17-1617, No. 17-1618, No. 18-1676, No. 18-2034, No. 18-2036, No. 18-2037, No. 18-2123, No. 18-2357, No. 19-1720, No. 19-2340, No. 20-1026, No. 21-113, No. 21-114</p> <p><u>Extrinsic Evidence</u></p> <p><u>District Court Cases</u>⁵</p>

³ Reference to an *Inter Partes* Reexamination is intended to refer to all papers associated with the reexamination, including but not limited to all non-final and final actions, patent owner responses, briefs, communications, and exhibits.

⁴ Reference to a Federal Circuit appeal is intended to refer to all materials associated with the appeal, including but not limited to briefs, motions, replies, orders, decisions, and appendices.

⁵ Reference to a district court case is intended to refer to all materials associated with the litigation, including but not limited to briefs, pleadings, motions, disclosures, replies, orders, decisions, and appendices.

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		<p>No. 2:09-cv-06900 (C.D. Cal.), No. 8:13-cv-00996 (C.D. Cal.), No. 8:16-cv-01605 (C.D. Cal.), No. 8:17-cv-01030 (C.D. Cal.), No. 2:12-cv-02319 (E.D. Cal.), No. 2:13-cv-02613 (E.D. Cal.), No. 3:09-cv-05718 (N.D. Cal.) (<i>see, e.g.</i>, Dkt. No. 45, Exhibit A at 1), No. 4:08-cv-04144 (N.D. Cal.), No. 4:13-cv-03901 (N.D. Cal.), No. 4:13-cv-03916 (N.D. Cal.), No. 4:13-cv-05889 (N.D. Cal.), No. 4:13-cv-05962 (N.D. Cal.), No. 5:22-mc-80337 (N.D. Cal.), No. 1:09-cv-00165 (D. Del.), No. 1:21-cv-01453 (D. Del.), No. 2:21-cv-00463 (E.D. Tex.), No. 2:22-cv-00203 (E.D. Tex.), No. 2:22-cv-00294 (E.D. Tex.), No. 1:22-cv-00134 (W.D. Tex.), No. 1:22-cv-00136 (W.D. Tex.), No. 6:20-cv-00194 (W.D. Tex.), No. 6:20-cv-00525 (W.D. Tex.), No. 6:21-cv-00430 (W.D. Tex.), No. 6:21-cv-00431 (W.D. Tex.)</p> <p><u>International Trade Commission Investigations</u>⁶</p> <p>No. 337-TA-1023, No. 337-TA-1089</p> <p><u>Others</u></p> <p>JEDEC Standards: JESD 205 Standard, JESD 82-20A Standard, JESD 206 Standard, JESD 79-2F Standard, JEDEC Standard No. 21C, JEDEC No. 21C Specification for DDR3 LRDIMM, JESD 82-30 Standard, JESD 79-3F Standard, JESD 248A Standard, JESD 79-4 Standard, JESD 82-31A Standard, JESD 79-4-1B Standard, JESD 79-4C Standard</p> <p>Memory Systems: Cache, DRAM, Disk (Bruce Jacob) (2008)</p> <p>Synchronous DRAM Architectures, Organizations, and Alternative Technologies (Bruce Jacob) (December 10, 2002)</p>

⁶ Reference to an International Trade Commission (ITC) Investigation is intended to refer to all materials associated with the ITC investigation, including but not limited to briefs, motions, replies, orders, decisions, and appendices.

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		<p>Micron may rely on testimony of Dr. Harold Stone to explain the technology, state of the art at the time the applications leading to the '912 patent was filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Micron may also rely on extrinsic evidence identified by Plaintiff or Defendants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Semiconductor, Inc. (collectively, "Samsung Defendants") in the Lead Case, including but not limited to, any expert testimony.</p>
'912: 16	<p>"row[/column] address signal"</p> <p>'912 patent: all claims</p>	<p>"a varying electrical impulse that conveys an address of either a row or a column of memory locations from one point to another"</p> <p><u>Intrinsic Evidence</u></p> <p><u>U.S. Patent No. 7619912</u></p> <p>5:22-45; 6:55-64; 7:36-11:42; 12:11-20:63; 21:13-22:63; Figures 1A, 1B, 2A, 2B, 3A, and 3B.</p> <p>JEDEC standard JESD79D, "Double Data Rate (DDR) SDRAM Specification." published February 2004.</p> <p><u>File Histories</u></p> <p>File histories of U.S. Patents: No. 7619912, No. 7286436, No. 7289386, No. 7532537, No. 7636274, No. 8154901, No. 8001434, No. 8417870, No. 7864627, No. 7881150, No. 8516185, No. 7965578, No. 8081535, No. 7916574, No. 7965579, No. 8072837, No. 8081536, No. 8081537, No. 8359501, No. 8756364, No. 8516188, No. 8787060, No. 8782350, No. 8689064, No. 9128632, No. 9606907, No. 9037774, No. 10217523, No. 9037809, No. 9318160, No. 9858215, No. 9846659, No. 11093417, No. 10902886, No.</p>

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		<p>10860506, No. 10489314, No. 10268608, No. 10290328, No. 10949339, No. 9824035, No. 9659601, No. 9563587, No. 10025731, No. 61409893</p> <p>File histories of U.S. Patent Applications: No. 2022/0208233, No. 2021/0382834, No. 2021/0271593, No. 2021/0149829, No. 2019/0295675, No. 2021/0225415</p> <p><u>Inter Partes Reviews</u></p> <p>IPR2014-00882 (<i>see, e.g.</i>, POPR (Paper 9) at 5, 17), IPR2014-00883 (<i>see, e.g.</i>, POPR (Paper 8) at 5-7, 15; POR (Paper 25) at 26), IPR2014-00970, IPR2014-00971, IPR2014-01011, IPR2014-01029, IPR2014-01369, IPR2014-01370, IPR2014-01371, IPR2014-01372, IPR2014-01373, IPR2014-01374, IPR2014-01375, IPR2015-01020, IPR2015-01021, IPR2017-00548, IPR2017-00549, IPR2017-00560, IPR2017-00561, IPR2017-00562, IPR2017-00577, IPR2017-00587, IPR2017-00667, IPR2017-00668, IPR2017-00692, IPR2017-00730, IPR2018-00303, IPR2018-00362, IPR2018-00363, IPR2018-00364, IPR2018-00365, IPR2020-01042, IPR2020-01044, IPR2020-01421, IPR2022-00062, IPR2022-00063, IPR2022-00064, IPR2022-00236, IPR2022-00237, IPR2022-00615, IPR2022-00639, IPR2022-00711, IPR2022-00744, IPR2022-00745, IPR2022-00996, IPR2022-00999, IPR2022-01427, IPR2022-01428, IPR2023-00203, IPR2023-00204, IPR2023-00205, IPR2023-00405, IPR2023-00406, IPR2023-00454, IPR2023-00455, IPR2023-00847, IPR2023-00883</p> <p><u>Inter Partes Reexaminations</u></p> <p>No. 95/000546, No. 95/000577, No. 95/000578, No. 95/000579, No. 95/001337, No. 95/001339, No. 95/001381, No. 95/001758</p> <p><u>Federal Circuit Appeals</u></p>

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		<p>No. 15-126, No. 15-1179, No. 16-1742 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-1743 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-1744 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-2274, No. 16-2666, No. 17-1617, No. 17-1618, No. 18-1676, No. 18-2034, No. 18-2036, No. 18-2037, No. 18-2123, No. 18-2357, No. 19-1720, No. 19-2340, No. 20-1026, No. 21-113, No. 21-114</p> <p><u>Extrinsic Evidence</u></p> <p><u>District Court Cases</u></p> <p>No. 2:09-cv-06900 (C.D. Cal.), No. 8:13-cv-00996 (C.D. Cal.), No. 8:16-cv-01605 (C.D. Cal.), No. 8:17-cv-01030 (C.D. Cal.), No. 2:12-cv-02319 (E.D. Cal.), No. 2:13-cv-02613 (E.D. Cal.), No. 3:09-cv-05718 (N.D. Cal.) (<i>see, e.g.</i>, Dkt. No. 45, Exhibit A at 1), No. 4:08-cv-04144 (N.D. Cal.), No. 4:13-cv-03901 (N.D. Cal.), No. 4:13-cv-03916 (N.D. Cal.), No. 4:13-cv-05889 (N.D. Cal.), No. 4:13-cv-05962 (N.D. Cal.), No. 5:22-mc-80337 (N.D. Cal.), No. 1:09-cv-00165 (D. Del.), No. 1:21-cv-01453 (D. Del.), No. 2:21-cv-00463 (E.D. Tex.), No. 2:22-cv-00203 (E.D. Tex.), No. 2:22-cv-00294 (E.D. Tex.), No. 1:22-cv-00134 (W.D. Tex.), No. 1:22-cv-00136 (W.D. Tex.), No. 6:20-cv-00194 (W.D. Tex.), No. 6:20-cv-00525 (W.D. Tex.), No. 6:21-cv-00430 (W.D. Tex.), No. 6:21-cv-00431 (W.D. Tex.)</p> <p><u>International Trade Commission Investigations</u></p> <p>No. 337-TA-1023, No. 337-TA-1089</p> <p><u>Others</u></p>

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		<p>JEDEC Standards: JESD 205 Standard, JESD 82-20A Standard, JESD 206 Standard, JESD 79-2F Standard, JEDEC Standard No. 21C, JEDEC No. 21C Specification for DDR3 LRDIMM, JESD 82-30 Standard, JESD 79-3F Standard, JESD 248A Standard, JESD 79-4 Standard, JESD 82-31A Standard, JESD 79-4-1B Standard, JESD 79-4C Standard</p> <p>Memory Systems: Cache, DRAM, Disk (Bruce Jacob) (2008)</p> <p>Synchronous DRAM Architectures, Organizations, and Alternative Technologies (Bruce Jacob) (December 10, 2002)</p> <p>The Penguin Dictionary of Electronics ("signal")</p> <p>Collins Dictionary Electronics: Definitions for the Digital Age ("signal")</p> <p>Microsoft Computer Dictionary, Fifth edition 2002 ("signal")</p> <p>McGraw-Hill Dictionary of Electrical and Computer Engineering, Sixth Edition, at p. 9 ("address") (2003)</p> <p>Newton's Telecom Dictionary, 19th Edition, at pp. 44–45 ("address"), 721 ("signal") (2003)</p> <p>Wiley Electrical and Electronics Engineering Dictionary, IEEE Press, at pp. 14 ("address"), 125 ("column"), 673 ("row") (2004)</p> <p>Micron may rely on testimony of Dr. Harold Stone to explain the technology, state of the art at the time the applications leading to the '912 patent was filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p>

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		Micron may also rely on extrinsic evidence identified by Plaintiff or Samsung Defendants in the Lead Case, including but not limited to, any expert testimony.
'912: 15, 16, 28, 86, 88	<p data-bbox="380 396 732 461">"coupled to the printed circuit board"</p> <p data-bbox="380 505 732 570">'912 patent: 15, 16, 28, 86, 88</p>	<p data-bbox="762 396 1423 428">"electrically connected to the printed circuit board."</p> <p data-bbox="762 461 1014 493"><u>Intrinsic Evidence</u></p> <p data-bbox="762 526 1083 558"><u>U.S. Patent No. 7619912</u></p> <p data-bbox="762 602 1955 667">2:45-59; 3:15-29; 4:25-28; 5:6-55; 6:4-11; 21:36-24:58; 25:26-44; 26:2-28; 28:13-24; 28:45-58; 29:1-30; 30:22-31:23; 31:56-32:3; Figures 1A, 1B, 2A, 2B, 3A, 6A, 10, 11A, 11B</p> <p data-bbox="762 711 1919 776">JEDEC standard JESD79D, "Double Data Rate (DDR) SDRAM Specification." published February 2004.</p> <p data-bbox="762 813 936 846"><u>File Histories</u></p> <p data-bbox="762 889 1927 1174">File histories of U.S. Patents: No. 7619912, No. 7286436, No. 7289386, No. 7532537, No. 7636274, No. 8154901, No. 8001434, No. 8417870, No. 7864627, No. 7881150, No. 8516185, No. 7965578, No. 8081535, No. 7916574, No. 7965579, No. 8072837, No. 8081536, No. 8081537, No. 8359501, No. 8756364, No. 8516188, No. 8787060, No. 8782350, No. 8689064, No. 9128632, No. 9606907, No. 9037774, No. 10217523, No. 9037809, No. 9318160, No. 9858215, No. 9846659, No. 11093417, No. 10902886, No. 10860506, No. 10489314, No. 10268608, No. 10290328, No. 10949339, No. 9824035, No. 9659601, No. 9563587, No. 10025731, No. 61409893</p> <p data-bbox="762 1218 1860 1282">File histories of U.S. Patent Applications: No. 2022/0208233, No. 2021/0382834, No. 2021/0271593, No. 2021/0149829, No. 2019/0295675, No. 2021/0225415</p> <p data-bbox="762 1326 1035 1359"><u>Inter Partes Reviews</u></p>

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		<p>IPR2014-00882 (<i>see, e.g.</i>, POPR (Paper 9) at 5, 17), IPR2014-00883 (<i>see, e.g.</i>, POPR (Paper 8) at 5-7, 15; POR (Paper 25) at 26), IPR2014-00970, IPR2014-00971, IPR2014-01011, IPR2014-01029, IPR2014-01369, IPR2014-01370, IPR2014-01371, IPR2014-01372, IPR2014-01373, IPR2014-01374, IPR2014-01375, IPR2015-01020, IPR2015-01021, IPR2017-00548, IPR2017-00549, IPR2017-00560, IPR2017-00561, IPR2017-00562, IPR2017-00577, IPR2017-00587, IPR2017-00667, IPR2017-00668, IPR2017-00692, IPR2017-00730, IPR2018-00303, IPR2018-00362, IPR2018-00363, IPR2018-00364, IPR2018-00365, IPR2020-01042, IPR2020-01044, IPR2020-01421, IPR2022-00062, IPR2022-00063, IPR2022-00064, IPR2022-00236, IPR2022-00237, IPR2022-00615, IPR2022-00639, IPR2022-00711, IPR2022-00744, IPR2022-00745, IPR2022-00996, IPR2022-00999, IPR2022-01427, IPR2022-01428, IPR2023-00203, IPR2023-00204, IPR2023-00205, IPR2023-00405, IPR2023-00406, IPR2023-00454, IPR2023-00455, IPR2023-00847, IPR2023-00883</p> <p><u>Inter Partes Reexaminations</u></p> <p>No. 95/000546, No. 95/000577, No. 95/000578, No. 95/000579, No. 95/001337, No. 95/001339, No. 95/001381, No. 95/001758</p> <p><u>Federal Circuit Appeals</u></p> <p>No. 15-126, No. 15-1179, No. 16-1742 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-1743 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-1744 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-2274, No. 16-2666, No. 17-1617, No. 17-1618, No. 18-1676, No. 18-2034, No. 18-2036, No. 18-2037, No. 18-2123, No. 18-2357, No. 19-1720, No. 19-2340, No. 20-1026, No. 21-113, No. 21-114</p>

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		<p><u>Extrinsic Evidence</u></p> <p><u>District Court Cases</u></p> <p>No. 2:09-cv-06900 (C.D. Cal.), No. 8:13-cv-00996 (C.D. Cal.), No. 8:16-cv-01605 (C.D. Cal.), No. 8:17-cv-01030 (C.D. Cal.), No. 2:12-cv-02319 (E.D. Cal.), No. 2:13-cv-02613 (E.D. Cal.), No. 3:09-cv-05718 (N.D. Cal.) (<i>see, e.g.</i>, Dkt. No. 45, Exhibit A at 1), No. 4:08-cv-04144 (N.D. Cal.), No. 4:13-cv-03901 (N.D. Cal.), No. 4:13-cv-03916 (N.D. Cal.), No. 4:13-cv-05889 (N.D. Cal.), No. 4:13-cv-05962 (N.D. Cal.), No. 5:22-mc-80337 (N.D. Cal.), No. 1:09-cv-00165 (D. Del.), No. 1:21-cv-01453 (D. Del.), No. 2:21-cv-00463 (E.D. Tex.), No. 2:22-cv-00203 (E.D. Tex.), No. 2:22-cv-00294 (E.D. Tex.), No. 1:22-cv-00134 (W.D. Tex.), No. 1:22-cv-00136 (W.D. Tex.), No. 6:20-cv-00194 (W.D. Tex.), No. 6:20-cv-00525 (W.D. Tex.), No. 6:21-cv-00430 (W.D. Tex.), No. 6:21-cv-00431 (W.D. Tex.)</p> <p><u>International Trade Commission Investigations</u></p> <p>No. 337-TA-1023, No. 337-TA-1089</p> <p><u>Others</u></p> <p>JEDEC Standards: JESD 205 Standard, JESD 82-20A Standard, JESD 206 Standard, JESD 79-2F Standard, JEDEC Standard No. 21C, JEDEC No. 21C Specification for DDR3 LRDIMM, JESD 82-30 Standard, JESD 79-3F Standard, JESD 248A Standard, JESD 79-4 Standard, JESD 82-31A Standard, JESD 79-4-1B Standard, JESD 79-4C Standard</p> <p>Memory Systems: Cache, DRAM, Disk (Bruce Jacob) (2008)</p> <p>Synchronous DRAM Architectures, Organizations, and Alternative Technologies (Bruce Jacob) (December 10, 2002)</p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		<p>McGraw-Hill Dictionary of Electrical and Computer Engineering, Sixth Edition, at p. 124 (“couple”) (2003)</p> <p>Micron may rely on testimony of Dr. Harold Stone to explain the technology, state of the art at the time the applications leading to the '912 patent was filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Micron may also rely on extrinsic evidence identified by Plaintiff or Samsung Defendants in the Lead Case, including but not limited to, any expert testimony.</p>
'912: 1, 39, 77, 80, 82, 90	“mounted to the printed circuit board”	<p>“attached to the printed circuit board”</p> <p><u>Intrinsic Evidence</u></p> <p><u>U.S. Patent No. 7619912</u></p> <p>1:25-34; 2:46-3:28; 4:25-28; 5:5-7:53; 21:36-24:58; 28:13-44; 31:24-31; Figures 1A, 1B, 2A, 2B, 3A, 10, 11A, 11B.</p> <p>JEDEC standard JESD79D, “Double Data Rate (DDR) SDRAM Specification.” published February 2004.</p> <p><u>File Histories</u></p> <p>File histories of U.S. Patents: No. 7619912, No. 7286436, No. 7289386, No. 7532537, No. 7636274, No. 8154901, No. 8001434, No. 8417870, No. 7864627, No. 7881150, No. 8516185, No. 7965578, No. 8081535, No. 7916574, No. 7965579, No. 8072837, No. 8081536, No. 8081537, No. 8359501, No. 8756364, No. 8516188, No. 8787060, No. 8782350, No. 8689064, No. 9128632, No. 9606907, No. 9037774, No. 10217523, No. 9037809, No. 9318160, No. 9858215, No. 9846659, No. 11093417, No. 10902886, No.</p>

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		<p>10860506, No. 10489314, No. 10268608, No. 10290328, No. 10949339, No. 9824035, No. 9659601, No. 9563587, No. 10025731, No. 61409893</p> <p>File histories of U.S. Patent Applications: No. 2022/0208233, No. 2021/0382834, No. 2021/0271593, No. 2021/0149829, No. 2019/0295675, No. 2021/0225415</p> <p><u>Inter Partes Reviews</u></p> <p>IPR2014-00882 (<i>see, e.g.</i>, POPR (Paper 9) at 5, 17), IPR2014-00883 (<i>see, e.g.</i>, POPR (Paper 8) at 5-7, 15; POR (Paper 25) at 26), IPR2014-00970, IPR2014-00971, IPR2014-01011, IPR2014-01029, IPR2014-01369, IPR2014-01370, IPR2014-01371, IPR2014-01372, IPR2014-01373, IPR2014-01374, IPR2014-01375, IPR2015-01020, IPR2015-01021, IPR2017-00548, IPR2017-00549, IPR2017-00560, IPR2017-00561, IPR2017-00562, IPR2017-00577, IPR2017-00587, IPR2017-00667, IPR2017-00668, IPR2017-00692, IPR2017-00730, IPR2018-00303, IPR2018-00362, IPR2018-00363, IPR2018-00364, IPR2018-00365, IPR2020-01042, IPR2020-01044, IPR2020-01421, IPR2022-00062, IPR2022-00063, IPR2022-00064, IPR2022-00236, IPR2022-00237, IPR2022-00615, IPR2022-00639, IPR2022-00711, IPR2022-00744, IPR2022-00745, IPR2022-00996, IPR2022-00999, IPR2022-01427, IPR2022-01428, IPR2023-00203, IPR2023-00204, IPR2023-00205, IPR2023-00405, IPR2023-00406, IPR2023-00454, IPR2023-00455, IPR2023-00847, IPR2023-00883</p> <p><u>Inter Partes Reexaminations</u></p> <p>No. 95/000546, No. 95/000577, No. 95/000578, No. 95/000579, No. 95/001337, No. 95/001339, No. 95/001381, No. 95/001758</p> <p><u>Federal Circuit Appeals</u></p>

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		<p>No. 15-126, No. 15-1179, No. 16-1742 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-1743 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-1744 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-2274, No. 16-2666, No. 17-1617, No. 17-1618, No. 18-1676, No. 18-2034, No. 18-2036, No. 18-2037, No. 18-2123, No. 18-2357, No. 19-1720, No. 19-2340, No. 20-1026, No. 21-113, No. 21-114</p> <p><u>Extrinsic Evidence</u></p> <p><u>District Court Cases</u></p> <p>No. 2:09-cv-06900 (C.D. Cal.), No. 8:13-cv-00996 (C.D. Cal.), No. 8:16-cv-01605 (C.D. Cal.), No. 8:17-cv-01030 (C.D. Cal.), No. 2:12-cv-02319 (E.D. Cal.), No. 2:13-cv-02613 (E.D. Cal.), No. 3:09-cv-05718 (N.D. Cal.) (<i>see, e.g.</i>, Dkt. No. 45, Exhibit A at 1), No. 4:08-cv-04144 (N.D. Cal.), No. 4:13-cv-03901 (N.D. Cal.), No. 4:13-cv-03916 (N.D. Cal.), No. 4:13-cv-05889 (N.D. Cal.), No. 4:13-cv-05962 (N.D. Cal.), No. 5:22-mc-80337 (N.D. Cal.), No. 1:09-cv-00165 (D. Del.), No. 1:21-cv-01453 (D. Del.), No. 2:21-cv-00463 (E.D. Tex.), No. 2:22-cv-00203 (E.D. Tex.), No. 2:22-cv-00294 (E.D. Tex.), No. 1:22-cv-00134 (W.D. Tex.), No. 1:22-cv-00136 (W.D. Tex.), No. 6:20-cv-00194 (W.D. Tex.), No. 6:20-cv-00525 (W.D. Tex.), No. 6:21-cv-00430 (W.D. Tex.), No. 6:21-cv-00431 (W.D. Tex.)</p> <p><u>International Trade Commission Investigations</u></p> <p>No. 337-TA-1023, No. 337-TA-1089</p> <p><u>Others</u></p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
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'912: 1, 15, 28, 39	<p>"wherein the logic element generates gated column access strobe (CAS) signals or chip-select signals of the output [control] signals in response at least in part to (i) the [at least one] row address signal, (ii) the bank</p>	<p>"the logic element generates gated column access strobe signals or chip-select signals in response at least in part to all four of (i) the at least one row address signal, (ii) the bank address signals, (iii) the at least one chip-select signal of the set of input control signals and (iv) the PLL clock signal"</p> <p><u>Intrinsic Evidence</u></p> <p><u>U.S. Patent No. 7619912</u></p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
	address signals, and (iii) the [at least one] chip-select signal of the [set/plurality] of input [control] signals and (iv) the PLL clock signal”	<p>4:42-5:21; 6:55-9:21; 11:43-12:10; 12:12-23:25; 24:1-13; 26:1-27; Figs 1A, 1B, 2A, 2B, 3A, 3B, 11A, 11B.</p> <p>JEDEC standard JESD79D, “Double Data Rate (DDR) SDRAM Specification.” published February 2004.</p> <p><u>File Histories</u></p> <p>File histories of U.S. Patents: No. 7619912, No. 7286436, No. 7289386, No. 7532537, No. 7636274, No. 8154901, No. 8001434, No. 8417870, No. 7864627, No. 7881150, No. 8516185, No. 7965578, No. 8081535, No. 7916574, No. 7965579, No. 8072837, No. 8081536, No. 8081537, No. 8359501, No. 8756364, No. 8516188, No. 8787060, No. 8782350, No. 8689064, No. 9128632, No. 9606907, No. 9037774, No. 10217523, No. 9037809, No. 9318160, No. 9858215, No. 9846659, No. 11093417, No. 10902886, No. 10860506, No. 10489314, No. 10268608, No. 10290328, No. 10949339, No. 9824035, No. 9659601, No. 9563587, No. 10025731, No. 61409893</p> <p>File histories of U.S. Patent Applications: No. 2022/0208233, No. 2021/0382834, No. 2021/0271593, No. 2021/0149829, No. 2019/0295675, No. 2021/0225415</p> <p><u>Inter Partes Reviews</u></p> <p>IPR2014-00882 (<i>see, e.g.</i>, POPR (Paper 9) at 5, 17), IPR2014-00883 (<i>see, e.g.</i>, POPR (Paper 8) at 5-7, 15; POR (Paper 25) at 26), IPR2014-00970, IPR2014-00971, IPR2014-01011, IPR2014-01029, IPR2014-01369, IPR2014-01370, IPR2014-01371, IPR2014-01372, IPR2014-01373, IPR2014-01374, IPR2014-01375, IPR2015-01020, IPR2015-01021, IPR2017-00548, IPR2017-00549, IPR2017-00560, IPR2017-00561, IPR2017-00562, IPR2017-00577, IPR2017-00587, IPR2017-00667, IPR2017-00668, IPR2017-00692, IPR2017-00730, IPR2018-00303, IPR2018-00362, IPR2018-00363, IPR2018-00364, IPR2018-00365, IPR2020-01042, IPR2020-01044, IPR2020-01421, IPR2022-00062,</p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		<p>IPR2022-00063, IPR2022-00064, IPR2022-00236, IPR2022-00237, IPR2022-00615, IPR2022-00639, IPR2022-00711, IPR2022-00744, IPR2022-00745, IPR2022-00996, IPR2022-00999, IPR2022-01427, IPR2022-01428, IPR2023-00203, IPR2023-00204, IPR2023-00205, IPR2023-00405, IPR2023-00406, IPR2023-00454, IPR2023-00455, IPR2023-00847, IPR2023-00883</p> <p><u>Inter Partes Reexaminations</u></p> <p>No. 95/000546, No. 95/000577, No. 95/000578, No. 95/000579, No. 95/001337, No. 95/001339, No. 95/001381, No. 95/001758</p> <p><u>Federal Circuit Appeals</u></p> <p>No. 15-126, No. 15-1179, No. 16-1742 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-1743 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-1744 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-2274, No. 16-2666, No. 17-1617, No. 17-1618, No. 18-1676, No. 18-2034, No. 18-2036, No. 18-2037, No. 18-2123, No. 18-2357, No. 19-1720, No. 19-2340, No. 20-1026, No. 21-113, No. 21-114</p> <p><u>Extrinsic Evidence</u></p> <p><u>District Court Cases</u></p> <p>No. 2:09-cv-06900 (C.D. Cal.), No. 8:13-cv-00996 (C.D. Cal.), No. 8:16-cv-01605 (C.D. Cal.), No. 8:17-cv-01030 (C.D. Cal.), No. 2:12-cv-02319 (E.D. Cal.), No. 2:13-cv-02613 (E.D. Cal.), No. 3:09-cv-05718 (N.D. Cal.) (<i>see, e.g.</i>, Dkt. No. 45, Exhibit A at 1), No. 4:08-cv-04144 (N.D. Cal.), No. 4:13-cv-03901 (N.D. Cal.), No. 4:13-cv-03916 (N.D. Cal.), No. 4:13-</p>

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		<p>cv-05889 (N.D. Cal.), No. 4:13-cv-05962 (N.D. Cal.), No. 5:22-mc-80337 (N.D. Cal.), No. 1:09-cv-00165 (D. Del.), No. 1:21-cv-01453 (D. Del.), No. 2:21-cv-00463 (E.D. Tex.), No. 2:22-cv-00203 (E.D. Tex.), No. 2:22-cv-00294 (E.D. Tex.), No. 1:22-cv-00134 (W.D. Tex.), No. 1:22-cv-00136 (W.D. Tex.), No. 6:20-cv-00194 (W.D. Tex.), No. 6:20-cv-00525 (W.D. Tex.), No. 6:21-cv-00430 (W.D. Tex.), No. 6:21-cv-00431 (W.D. Tex.)</p> <p><u>International Trade Commission Investigations</u></p> <p>No. 337-TA-1023, No. 337-TA-1089</p> <p><u>Others</u></p> <p>JEDEC Standards: JESD 205 Standard, JESD 82-20A Standard, JESD 206 Standard, JESD 79-2F Standard, JEDEC Standard No. 21C, JEDEC No. 21C Specification for DDR3 LRDIMM, JESD 82-30 Standard, JESD 79-3F Standard, JESD 248A Standard, JESD 79-4 Standard, JESD 82-31A Standard, JESD 79-4-1B Standard, JESD 79-4C Standard</p> <p>Memory Systems: Cache, DRAM, Disk (Bruce Jacob) (2008)</p> <p>Synchronous DRAM Architectures, Organizations, and Alternative Technologies (Bruce Jacob) (December 10, 2002)</p> <p>Micron may rely on testimony of Dr. Harold Stone to explain the technology, state of the art at the time the applications leading to the '912 patent was filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Micron may also rely on extrinsic evidence identified by Plaintiff or Samsung Defendants in the Lead Case, including but not limited to, any expert testimony.</p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
'912: 77	<p>“wherein the logic element responds to at least (i) a row address bit of the at least one row/column address signal, (ii) the bank signals, and (iii) the at least one chip-select signal of the set of input control signals and (iv) the PLL clock by generating a first number of chip-select signals of the set of output control signals, the first number of chip-select signals generated by the logic element equal to the first number of ranks, and the at least one chip-select signal of the set of input control signals comprises a second number of chip-select signals equal to the second number of ranks”</p>	<p>“the logic element generates a number of chip-select signals equal to the first number of ranks in response to all four of (i) a row address bit of the at least one row/column address signal, (ii) the bank address signals, (iii) a number of chip-select signals of the set of input control signals equal to the second number of ranks and (iv) the PLL clock signal”</p> <p><u>Intrinsic Evidence</u></p> <p><u>U.S. Patent No. 7619912</u></p> <p>4:42-5:21; 6:55-9:21; 11:43-12:10; 12:12-23:25; 24:1-13; 26:1-27; Figs 1A, 1B, 2A, 2B, 3A, 3B, 11A, 11B.</p> <p>JEDEC standard JESD79D, “Double Data Rate (DDR) SDRAM Specification.” published February 2004.</p> <p><u>File Histories</u></p> <p>File histories of U.S. Patents: No. 7619912, No. 7286436, No. 7289386, No. 7532537, No. 7636274, No. 8154901, No. 8001434, No. 8417870, No. 7864627, No. 7881150, No. 8516185, No. 7965578, No. 8081535, No. 7916574, No. 7965579, No. 8072837, No. 8081536, No. 8081537, No. 8359501, No. 8756364, No. 8516188, No. 8787060, No. 8782350, No. 8689064, No. 9128632, No. 9606907, No. 9037774, No. 10217523, No. 9037809, No. 9318160, No. 9858215, No. 9846659, No. 11093417, No. 10902886, No. 10860506, No. 10489314, No. 10268608, No. 10290328, No. 10949339, No. 9824035, No. 9659601, No. 9563587, No. 10025731, No. 61409893</p> <p>File histories of U.S. Patent Applications: No. 2022/0208233, No. 2021/0382834, No. 2021/0271593, No. 2021/0149829, No. 2019/0295675, No. 2021/0225415</p> <p><u>Inter Partes Reviews</u></p>

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Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		<p>Micron may rely on testimony of Dr. Harold Stone to explain the technology, state of the art at the time the applications leading to the '912 patent was filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Micron may also rely on extrinsic evidence identified by Plaintiff or Samsung Defendants in the Lead Case, including but not limited to, any expert testimony.</p>
'912: 80	<p>“wherein the generation of the first number of chip-select signals of the output control signals by the logic element is based on the logic element responsive at least in part to (i) the at least one row address signal, (ii) the bank address signals, and (iii) the at least one chip-select signal of the set of input control signals received by the logic element and (iv) the clock signals received from the phase-lock loop device”</p>	<p>“the logic element generates the first number of chip-select signals in response at least in part to all four of (i) the at least one row address signal, (ii) the bank address signals, (iii) the at least one chip-select signal of the set of input control signals and (iv) the PLL clock signal”</p> <p><u>Intrinsic Evidence</u></p> <p><u>U.S. Patent No. 7619912</u></p> <p>4:42-5:21; 6:55-9:21; 11:43-12:10; 12:12-23:25; 24:1-13; 26:1-27; Figs 1A, 1B, 2A, 2B, 3A, 3B, 11A, 11B.</p> <p>JEDEC standard JESD79D, “Double Data Rate (DDR) SDRAM Specification.” published February 2004.</p> <p><u>File Histories</u></p> <p>File histories of U.S. Patents: No. 7619912, No. 7286436, No. 7289386, No. 7532537, No. 7636274, No. 8154901, No. 8001434, No. 8417870, No. 7864627, No. 7881150, No. 8516185, No. 7965578, No. 8081535, No. 7916574, No. 7965579, No. 8072837, No. 8081536, No. 8081537, No. 8359501, No. 8756364, No. 8516188, No. 8787060, No. 8782350, No. 8689064, No. 9128632, No. 9606907, No. 9037774, No. 10217523, No. 9037809, No. 9318160, No. 9858215, No. 9846659, No. 11093417, No. 10902886, No.</p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		<p>10860506, No. 10489314, No. 10268608, No. 10290328, No. 10949339, No. 9824035, No. 9659601, No. 9563587, No. 10025731, No. 61409893</p> <p><u>Inter Partes Reviews</u></p> <p>IPR2014-00882 (<i>see, e.g.</i>, POPR (Paper 9) at 5, 17), IPR2014-00883 (<i>see, e.g.</i>, POPR (Paper 8) at 5-7, 15; POR (Paper 25) at 26), IPR2014-00970, IPR2014-00971, IPR2014-01011, IPR2014-01029, IPR2014-01369, IPR2014-01370, IPR2014-01371, IPR2014-01372, IPR2014-01373, IPR2014-01374, IPR2014-01375, IPR2015-01020, IPR2015-01021, IPR2017-00548, IPR2017-00549, IPR2017-00560, IPR2017-00561, IPR2017-00562, IPR2017-00577, IPR2017-00587, IPR2017-00667, IPR2017-00668, IPR2017-00692, IPR2017-00730, IPR2018-00303, IPR2018-00362, IPR2018-00363, IPR2018-00364, IPR2018-00365, IPR2020-01042, IPR2020-01044, IPR2020-01421, IPR2022-00062, IPR2022-00063, IPR2022-00064, IPR2022-00236, IPR2022-00237, IPR2022-00615, IPR2022-00639, IPR2022-00711, IPR2022-00744, IPR2022-00745, IPR2022-00996, IPR2022-00999, IPR2022-01427, IPR2022-01428, IPR2023-00203, IPR2023-00204, IPR2023-00205, IPR2023-00405, IPR2023-00406, IPR2023-00454, IPR2023-00455, IPR2023-00847, IPR2023-00883</p> <p><u>Inter Partes Reexaminations</u></p> <p>No. 95/000546, No. 95/000577, No. 95/000578, No. 95/000579, No. 95/001337, No. 95/001339, No. 95/001381, No. 95/001758</p> <p><u>Federal Circuit Appeals</u></p> <p>No. 15-126, No. 15-1179, No. 16-1742 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-1743 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-1744</p>

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		<p>(<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-2274, No. 16-2666, No. 17-1617, No. 17-1618, No. 18-1676, No. 18-2034, No. 18-2036, No. 18-2037, No. 18-2123, No. 18-2357, No. 19-1720, No. 19-2340, No. 20-1026, No. 21-113, No. 21-114</p> <p><u>Extrinsic Evidence</u></p> <p><u>District Court Cases</u></p> <p>No. 2:09-cv-06900 (C.D. Cal.), No. 8:13-cv-00996 (C.D. Cal.), No. 8:16-cv-01605 (C.D. Cal.), No. 8:17-cv-01030 (C.D. Cal.), No. 2:12-cv-02319 (E.D. Cal.), No. 2:13-cv-02613 (E.D. Cal.), No. 3:09-cv-05718 (N.D. Cal.) (<i>see, e.g.</i>, Dkt. No. 45, Exhibit A at 1), No. 4:08-cv-04144 (N.D. Cal.), No. 4:13-cv-03901 (N.D. Cal.), No. 4:13-cv-03916 (N.D. Cal.), No. 4:13-cv-05889 (N.D. Cal.), No. 4:13-cv-05962 (N.D. Cal.), No. 5:22-mc-80337 (N.D. Cal.), No. 1:09-cv-00165 (D. Del.), No. 1:21-cv-01453 (D. Del.), No. 2:21-cv-00463 (E.D. Tex.), No. 2:22-cv-00203 (E.D. Tex.), No. 2:22-cv-00294 (E.D. Tex.), No. 1:22-cv-00134 (W.D. Tex.), No. 1:22-cv-00136 (W.D. Tex.), No. 6:20-cv-00194 (W.D. Tex.), No. 6:20-cv-00525 (W.D. Tex.), No. 6:21-cv-00430 (W.D. Tex.), No. 6:21-cv-00431 (W.D. Tex.)</p> <p><u>International Trade Commission Investigations</u></p> <p>No. 337-TA-1023, No. 337-TA-1089</p> <p><u>Others</u></p> <p>JEDEC Standards: JESD 205 Standard, JESD 82-20A Standard, JESD 206 Standard, JESD 79-2F Standard, JEDEC Standard No. 21C, JEDEC No. 21C Specification for DDR3 LRDIMM, JESD 82-30 Standard, JESD 79-3F Standard, JESD 248A Standard, JESD 79-4 Standard, JESD 82-31A Standard, JESD 79-4-1B Standard, JESD 79-4C Standard</p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		<p>Memory Systems: Cache, DRAM, Disk (Bruce Jacob) (2008)</p> <p>Synchronous DRAM Architectures, Organizations, and Alternative Technologies (Bruce Jacob) (December 10, 2002)</p> <p>Micron may rely on testimony of Dr. Harold Stone to explain the technology, state of the art at the time the applications leading to the '912 patent was filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Micron may also rely on extrinsic evidence identified by Plaintiff or Defendants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Semiconductor, Inc. (collectively, "Samsung Defendants") in the Lead Case, including but not limited to, any expert testimony.</p>
'912: 82, 86	<p>"wherein the logic element responds to at least the at least one row address signal, the bank address signals, and the at least one chip-select signal of the set of input [control] signals and the PLL clock signal by generating a number of rank-selecting signals of the set of output [control] signals that is greater than double or equal to double the number of chip-select</p>	<p>"the logic element generates a number of rank-selecting signals greater than or equal to double the number of input chip-select signals in response to all four of (i) the at least one row address signal, (ii) the bank address signals, (iii) the at least one chip-select signal of the set of input control signals and (iv) the PLL clock signal"</p> <p><u>Intrinsic Evidence</u></p> <p><u>U.S. Patent No. 7619912</u></p> <p>4:42-5:21; 6:55-9:21; 11:43-12:10; 12:12-23:25; 24:1-13; 26:1-27; Figs 1A, 1B, 2A, 2B, 3A, 3B, 11A, 11B.</p> <p>JEDEC standard JESD79D, "Double Data Rate (DDR) SDRAM Specification." published February 2004.</p> <p><u>File Histories</u></p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
	signals of the set of input [control] signals”	<p>File histories of U.S. Patents: No. 7619912, No. 7286436, No. 7289386, No. 7532537, No. 7636274, No. 8154901, No. 8001434, No. 8417870, No. 7864627, No. 7881150, No. 8516185, No. 7965578, No. 8081535, No. 7916574, No. 7965579, No. 8072837, No. 8081536, No. 8081537, No. 8359501, No. 8756364, No. 8516188, No. 8787060, No. 8782350, No. 8689064, No. 9128632, No. 9606907, No. 9037774, No. 10217523, No. 9037809, No. 9318160, No. 9858215, No. 9846659, No. 11093417, No. 10902886, No. 10860506, No. 10489314, No. 10268608, No. 10290328, No. 10949339, No. 9824035, No. 9659601, No. 9563587, No. 10025731, No. 61409893</p> <p>File histories of U.S. Patent Applications: No. 2022/0208233, No. 2021/0382834, No. 2021/0271593, No. 2021/0149829, No. 2019/0295675, No. 2021/0225415</p> <p><u>Inter Partes Reviews</u></p> <p>IPR2014-00882 (<i>see, e.g.</i>, POPR (Paper 9) at 5, 17), IPR2014-00883 (<i>see, e.g.</i>, POPR (Paper 8) at 5-7, 15; POR (Paper 25) at 26), IPR2014-00970, IPR2014-00971, IPR2014-01011, IPR2014-01029, IPR2014-01369, IPR2014-01370, IPR2014-01371, IPR2014-01372, IPR2014-01373, IPR2014-01374, IPR2014-01375, IPR2015-01020, IPR2015-01021, IPR2017-00548, IPR2017-00549, IPR2017-00560, IPR2017-00561, IPR2017-00562, IPR2017-00577, IPR2017-00587, IPR2017-00667, IPR2017-00668, IPR2017-00692, IPR2017-00730, IPR2018-00303, IPR2018-00362, IPR2018-00363, IPR2018-00364, IPR2018-00365, IPR2020-01042, IPR2020-01044, IPR2020-01421, IPR2022-00062, IPR2022-00063, IPR2022-00064, IPR2022-00236, IPR2022-00237, IPR2022-00615, IPR2022-00639, IPR2022-00711, IPR2022-00744, IPR2022-00745, IPR2022-00996, IPR2022-00999, IPR2022-01427, IPR2022-01428, IPR2023-00203, IPR2023-00204, IPR2023-00205, IPR2023-00405, IPR2023-00406, IPR2023-00454, IPR2023-00455, IPR2023-00847, IPR2023-00883</p> <p><u>Inter Partes Reexaminations</u></p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		<p>No. 95/000546, No. 95/000577, No. 95/000578, No. 95/000579, No. 95/001337, No. 95/001339, No. 95/001381, No. 95/001758</p> <p><u>Federal Circuit Appeals</u></p> <p>No. 15-126, No. 15-1179, No. 16-1742 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-1743 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-1744 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-2274, No. 16-2666, No. 17-1617, No. 17-1618, No. 18-1676, No. 18-2034, No. 18-2036, No. 18-2037, No. 18-2123, No. 18-2357, No. 19-1720, No. 19-2340, No. 20-1026, No. 21-113, No. 21-114</p> <p><u>Extrinsic Evidence</u></p> <p><u>District Court Cases</u></p> <p>No. 2:09-cv-06900 (C.D. Cal.), No. 8:13-cv-00996 (C.D. Cal.), No. 8:16-cv-01605 (C.D. Cal.), No. 8:17-cv-01030 (C.D. Cal.), No. 2:12-cv-02319 (E.D. Cal.), No. 2:13-cv-02613 (E.D. Cal.), No. 3:09-cv-05718 (N.D. Cal.) (<i>see, e.g.</i>, Dkt. No. 45, Exhibit A at 1), No. 4:08-cv-04144 (N.D. Cal.), No. 4:13-cv-03901 (N.D. Cal.), No. 4:13-cv-03916 (N.D. Cal.), No. 4:13-cv-05889 (N.D. Cal.), No. 4:13-cv-05962 (N.D. Cal.), No. 5:22-mc-80337 (N.D. Cal.), No. 1:09-cv-00165 (D. Del.), No. 1:21-cv-01453 (D. Del.), No. 2:21-cv-00463 (E.D. Tex.), No. 2:22-cv-00203 (E.D. Tex.), No. 2:22-cv-00294 (E.D. Tex.), No. 1:22-cv-00134 (W.D. Tex.), No. 1:22-cv-00136 (W.D. Tex.), No. 6:20-cv-00194 (W.D. Tex.), No. 6:20-cv-00525 (W.D. Tex.), No. 6:21-cv-00430 (W.D. Tex.), No. 6:21-cv-00431 (W.D. Tex.)</p> <p><u>International Trade Commission Investigations</u></p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		<p>No. 337-TA-1023, No. 337-TA-1089</p> <p><u>Others</u></p> <p>JEDEC Standards: JESD 205 Standard, JESD 82-20A Standard, JESD 206 Standard, JESD 79-2F Standard, JEDEC Standard No. 21C, JEDEC No. 21C Specification for DDR3 LRDIMM, JESD 82-30 Standard, JESD 79-3F Standard, JESD 248A Standard, JESD 79-4 Standard, JESD 82-31A Standard, JESD 79-4-1B Standard, JESD 79-4C Standard</p> <p>Memory Systems: Cache, DRAM, Disk (Bruce Jacob) (2008)</p> <p>Synchronous DRAM Architectures, Organizations, and Alternative Technologies (Bruce Jacob) (December 10, 2002)</p> <p>Micron may rely on testimony of Dr. Harold Stone to explain the technology, state of the art at the time the applications leading to the '912 patent was filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Micron may also rely on extrinsic evidence identified by Plaintiff or Samsung Defendants in the Lead Case, including but not limited to, any expert testimony.</p>
'912: 88	<p>"wherein the logic element responds to at least (i) the row address signal, (ii) the bank address signals, (iii) and the one chip-select signal of the set of input control signals and (iv) the</p>	<p>"the logic element generates a number of rank-selecting signals greater than or equal to double the number of input chip-select signals in response to all four of (i) the at least one row address signal, (ii) the bank address signals, (iii) the at least one chip-select signal of the set of input control signals and (iv) the PLL clock signal"</p> <p><u>Intrinsic Evidence</u></p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
	PLL clock signal by generating a number of rank-selecting signals of the set of output signals that is greater than double or equal to double the number of chip-select signals of the set of input control signals”	<p><u>U.S. Patent No. 7619912</u></p> <p>4:42-5:21; 6:55-9:21; 11:43-12:10; 12:12-23:25; 24:1-13; 26:1-27; Figs 1A, 1B, 2A, 2B, 3A, 3B, 11A, 11B.</p> <p>JEDEC standard JESD79D, “Double Data Rate (DDR) SDRAM Specification.” published February 2004.</p> <p><u>File Histories</u></p> <p>File histories of U.S. Patents: No. 7619912, No. 7286436, No. 7289386, No. 7532537, No. 7636274, No. 8154901, No. 8001434, No. 8417870, No. 7864627, No. 7881150, No. 8516185, No. 7965578, No. 8081535, No. 7916574, No. 7965579, No. 8072837, No. 8081536, No. 8081537, No. 8359501, No. 8756364, No. 8516188, No. 8787060, No. 8782350, No. 8689064, No. 9128632, No. 9606907, No. 9037774, No. 10217523, No. 9037809, No. 9318160, No. 9858215, No. 9846659, No. 11093417, No. 10902886, No. 10860506, No. 10489314, No. 10268608, No. 10290328, No. 10949339, No. 9824035, No. 9659601, No. 9563587, No. 10025731, No. 61409893</p> <p>File histories of U.S. Patent Applications: No. 2022/0208233, No. 2021/0382834, No. 2021/0271593, No. 2021/0149829, No. 2019/0295675, No. 2021/0225415</p> <p><u>Inter Partes Reviews</u></p> <p>IPR2014-00882 (<i>see, e.g.</i>, POPR (Paper 9) at 5, 17), IPR2014-00883 (<i>see, e.g.</i>, POPR (Paper 8) at 5-7, 15; POR (Paper 25) at 26), IPR2014-00970, IPR2014-00971, IPR2014-01011, IPR2014-01029, IPR2014-01369, IPR2014-01370, IPR2014-01371, IPR2014-01372, IPR2014-01373, IPR2014-01374, IPR2014-01375, IPR2015-01020, IPR2015-01021, IPR2017-00548, IPR2017-00549, IPR2017-00560, IPR2017-00561, IPR2017-00562, IPR2017-00577, IPR2017-00587, IPR2017-00667, IPR2017-00668, IPR2017-00692,</p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		<p>IPR2017-00730, IPR2018-00303, IPR2018-00362, IPR2018-00363, IPR2018-00364, IPR2018-00365, IPR2020-01042, IPR2020-01044, IPR2020-01421, IPR2022-00062, IPR2022-00063, IPR2022-00064, IPR2022-00236, IPR2022-00237, IPR2022-00615, IPR2022-00639, IPR2022-00711, IPR2022-00744, IPR2022-00745, IPR2022-00996, IPR2022-00999, IPR2022-01427, IPR2022-01428, IPR2023-00203, IPR2023-00204, IPR2023-00205, IPR2023-00405, IPR2023-00406, IPR2023-00454, IPR2023-00455, IPR2023-00847, IPR2023-00883</p> <p><u>Inter Partes Reexaminations</u></p> <p>No. 95/000546, No. 95/000577, No. 95/000578, No. 95/000579, No. 95/001337, No. 95/001339, No. 95/001381, No. 95/001758</p> <p><u>Federal Circuit Appeals</u></p> <p>No. 15-126, No. 15-1179, No. 16-1742 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-1743 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-1744 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-2274, No. 16-2666, No. 17-1617, No. 17-1618, No. 18-1676, No. 18-2034, No. 18-2036, No. 18-2037, No. 18-2123, No. 18-2357, No. 19-1720, No. 19-2340, No. 20-1026, No. 21-113, No. 21-114</p> <p><u>Extrinsic Evidence</u></p> <p><u>District Court Cases</u></p> <p>No. 2:09-cv-06900 (C.D. Cal.), No. 8:13-cv-00996 (C.D. Cal.), No. 8:16-cv-01605 (C.D. Cal.), No. 8:17-cv-01030 (C.D. Cal.), No. 2:12-cv-02319 (E.D. Cal.), No. 2:13-cv-02613 (E.D.</p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		<p>Cal.), No. 3:09-cv-05718 (N.D. Cal.) (<i>see</i>, e.g., Dkt. No. 45, Exhibit A at 1), No. 4:08-cv-04144 (N.D. Cal.), No. 4:13-cv-03901 (N.D. Cal.), No. 4:13-cv-03916 (N.D. Cal.), No. 4:13-cv-05889 (N.D. Cal.), No. 4:13-cv-05962 (N.D. Cal.), No. 5:22-mc-80337 (N.D. Cal.), No. 1:09-cv-00165 (D. Del.), No. 1:21-cv-01453 (D. Del.), No. 2:21-cv-00463 (E.D. Tex.), No. 2:22-cv-00203 (E.D. Tex.), No. 2:22-cv-00294 (E.D. Tex.), No. 1:22-cv-00134 (W.D. Tex.), No. 1:22-cv-00136 (W.D. Tex.), No. 6:20-cv-00194 (W.D. Tex.), No. 6:20-cv-00525 (W.D. Tex.), No. 6:21-cv-00430 (W.D. Tex.), No. 6:21-cv-00431 (W.D. Tex.)</p> <p><u>International Trade Commission Investigations</u></p> <p>No. 337-TA-1023, No. 337-TA-1089</p> <p><u>Others</u></p> <p>JEDEC Standards: JESD 205 Standard, JESD 82-20A Standard, JESD 206 Standard, JESD 79-2F Standard, JEDEC Standard No. 21C, JEDEC No. 21C Specification for DDR3 LRDIMM, JESD 82-30 Standard, JESD 79-3F Standard, JESD 248A Standard, JESD 79-4 Standard, JESD 82-31A Standard, JESD 79-4-1B Standard, JESD 79-4C Standard</p> <p>Memory Systems: Cache, DRAM, Disk (Bruce Jacob) (2008)</p> <p>Synchronous DRAM Architectures, Organizations, and Alternative Technologies (Bruce Jacob) (December 10, 2002)</p> <p>Micron may rely on testimony of Dr. Harold Stone to explain the technology, state of the art at the time the applications leading to the '912 patent was filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		Micron may also rely on extrinsic evidence identified by Plaintiff or Samsung Defendants in the Lead Case, including but not limited to, any expert testimony.
'912: 90	"wherein the logic element responds to at least (i) the at least one row signal, (ii) the bank address signals, (iii) and the second number of chip-select signals of the plurality of input signals and (iv) the PLL clock signal by generating the first number of chip-select signals of the plurality of output signals that is greater than double or equal to double the second number of chip-select signals of the plurality of input signals"	<p data-bbox="758 396 1978 526">"the logic element generates a number of chip select signals greater than or equal to double the number of input chip-select signals in response to all of (i) the at least one row address signal, (ii) the bank address signals, (iii) the second number of chip-select signals of the set of input control signals and (iv) the PLL clock signal"</p> <p data-bbox="758 558 1014 591"><u>Intrinsic Evidence</u></p> <p data-bbox="758 631 1083 664"><u>U.S. Patent No. 7619912</u></p> <p data-bbox="758 704 1948 769">4:42-5:21; 6:55-9:21; 11:43-12:10; 12:12-23:25; 24:1-13; 26:1-27; Figs 1A, 1B, 2A, 2B, 3A, 3B, 11A, 11B.</p> <p data-bbox="758 810 1919 875">JEDEC standard JESD79D, "Double Data Rate (DDR) SDRAM Specification." published February 2004.</p> <p data-bbox="758 915 936 948"><u>File Histories</u></p> <p data-bbox="758 989 1927 1273">File histories of U.S. Patents: No. 7619912, No. 7286436, No. 7289386, No. 7532537, No. 7636274, No. 8154901, No. 8001434, No. 8417870, No. 7864627, No. 7881150, No. 8516185, No. 7965578, No. 8081535, No. 7916574, No. 7965579, No. 8072837, No. 8081536, No. 8081537, No. 8359501, No. 8756364, No. 8516188, No. 8787060, No. 8782350, No. 8689064, No. 9128632, No. 9606907, No. 9037774, No. 10217523, No. 9037809, No. 9318160, No. 9858215, No. 9846659, No. 11093417, No. 10902886, No. 10860506, No. 10489314, No. 10268608, No. 10290328, No. 10949339, No. 9824035, No. 9659601, No. 9563587, No. 10025731, No. 61409893</p> <p data-bbox="758 1313 1860 1378">File histories of U.S. Patent Applications: No. 2022/0208233, No. 2021/0382834, No. 2021/0271593, No. 2021/0149829, No. 2019/0295675, No. 2021/0225415</p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		<p><u>Inter Partes Reviews</u></p> <p>IPR2014-00882 (<i>see, e.g.</i>, POPR (Paper 9) at 5, 17), IPR2014-00883 (<i>see, e.g.</i>, POPR (Paper 8) at 5-7, 15; POR (Paper 25) at 26), IPR2014-00970, IPR2014-00971, IPR2014-01011, IPR2014-01029, IPR2014-01369, IPR2014-01370, IPR2014-01371, IPR2014-01372, IPR2014-01373, IPR2014-01374, IPR2014-01375, IPR2015-01020, IPR2015-01021, IPR2017-00548, IPR2017-00549, IPR2017-00560, IPR2017-00561, IPR2017-00562, IPR2017-00577, IPR2017-00587, IPR2017-00667, IPR2017-00668, IPR2017-00692, IPR2017-00730, IPR2018-00303, IPR2018-00362, IPR2018-00363, IPR2018-00364, IPR2018-00365, IPR2020-01042, IPR2020-01044, IPR2020-01421, IPR2022-00062, IPR2022-00063, IPR2022-00064, IPR2022-00236, IPR2022-00237, IPR2022-00615, IPR2022-00639, IPR2022-00711, IPR2022-00744, IPR2022-00745, IPR2022-00996, IPR2022-00999, IPR2022-01427, IPR2022-01428, IPR2023-00203, IPR2023-00204, IPR2023-00205, IPR2023-00405, IPR2023-00406, IPR2023-00454, IPR2023-00455, IPR2023-00847, IPR2023-00883</p> <p><u>Inter Partes Reexaminations</u></p> <p>No. 95/000546, No. 95/000577, No. 95/000578, No. 95/000579, No. 95/001337, No. 95/001339, No. 95/001381, No. 95/001758</p> <p><u>Federal Circuit Appeals</u></p> <p>No. 15-126, No. 15-1179, No. 16-1742 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-1743 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-1744 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-2274, No. 16-2666, No. 17-</p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		<p>1617, No. 17-1618, No. 18-1676, No. 18-2034, No. 18-2036, No. 18-2037, No. 18-2123, No. 18-2357, No. 19-1720, No. 19-2340, No. 20-1026, No. 21-113, No. 21-114</p> <p><u>Extrinsic Evidence</u></p> <p><u>District Court Cases</u></p> <p>No. 2:09-cv-06900 (C.D. Cal.), No. 8:13-cv-00996 (C.D. Cal.), No. 8:16-cv-01605 (C.D. Cal.), No. 8:17-cv-01030 (C.D. Cal.), No. 2:12-cv-02319 (E.D. Cal.), No. 2:13-cv-02613 (E.D. Cal.), No. 3:09-cv-05718 (N.D. Cal.) (<i>see, e.g.</i>, Dkt. No. 45, Exhibit A at 1), No. 4:08-cv-04144 (N.D. Cal.), No. 4:13-cv-03901 (N.D. Cal.), No. 4:13-cv-03916 (N.D. Cal.), No. 4:13-cv-05889 (N.D. Cal.), No. 4:13-cv-05962 (N.D. Cal.), No. 5:22-mc-80337 (N.D. Cal.), No. 1:09-cv-00165 (D. Del.), No. 1:21-cv-01453 (D. Del.), No. 2:21-cv-00463 (E.D. Tex.), No. 2:22-cv-00203 (E.D. Tex.), No. 2:22-cv-00294 (E.D. Tex.), No. 1:22-cv-00134 (W.D. Tex.), No. 1:22-cv-00136 (W.D. Tex.), No. 6:20-cv-00194 (W.D. Tex.), No. 6:20-cv-00525 (W.D. Tex.), No. 6:21-cv-00430 (W.D. Tex.), No. 6:21-cv-00431 (W.D. Tex.)</p> <p><u>International Trade Commission Investigations</u></p> <p>No. 337-TA-1023, No. 337-TA-1089</p> <p><u>Others</u></p> <p>JEDEC Standards: JESD 205 Standard, JESD 82-20A Standard, JESD 206 Standard, JESD 79-2F Standard, JEDEC Standard No. 21C, JEDEC No. 21C Specification for DDR3 LRDIMM, JESD 82-30 Standard, JESD 79-3F Standard, JESD 248A Standard, JESD 79-4 Standard, JESD 82-31A Standard, JESD 79-4-1B Standard, JESD 79-4C Standard</p> <p>Memory Systems: Cache, DRAM, Disk (Bruce Jacob) (2008)</p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		<p>Synchronous DRAM Architectures, Organizations, and Alternative Technologies (Bruce Jacob) (December 10, 2002)</p> <p>Micron may rely on testimony of Dr. Harold Stone to explain the technology, state of the art at the time the applications leading to the '912 patent was filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Micron may also rely on extrinsic evidence identified by Plaintiff or Samsung Defendants in the Lead Case, including but not limited to, any expert testimony.</p>
'912: All Asserted Claims	"A memory module connectable to a computer system, the memory module comprising"	<p>Preamble not limiting.</p> <p>Plain and ordinary meaning.</p> <p><u>Intrinsic Evidence</u></p> <p><u>U.S. Patent No. 7619912</u></p> <p>Abstract; 2:46-3:28; 3:32-4:37; 4:42-58; 5:6-21; 5:46-6:11, 6:64-7:54; 9:24-12:10; 19:53-22:63; 23:60-24:38; 25:26-26:67; 28:13-57; 29:11-30; 30:22-32:50; Figures 1A, 1B, 2A, 2B, 11A, 11B.</p> <p>JEDEC standard JESD79D, "Double Data Rate (DDR) SDRAM Specification." published February 2004.</p> <p><u>Extrinsic Evidence</u></p> <p>Micron may rely on testimony of Dr. Harold Stone to explain the technology, state of the art at the time the applications leading to the '912 patent was filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could</p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		<p>discern the boundaries of this claim element with reasonable certainty.</p> <p>Micron may also rely on extrinsic evidence identified by Plaintiff or Samsung Defendants in the Lead Case, including but not limited to, any expert testimony.</p>
'912: All Asserted Claims	"signal"	<p>"a varying electrical impulse that conveys information from one point to another"</p> <p><u>Intrinsic Evidence</u></p> <p><u>U.S. Patent No. 7619912</u></p> <p>2:34-3:28; 3:61-64; 5:6-45; 4:1-11; 5:6-45; 6:55-12:10; 12:12-23:25; 23:27-25:67; 26:1-32:26; Figs 1A, 1B, 2A, 2B, 3A, 3B, 4A, 4B, 5, 6A-6E.</p> <p>JEDEC standard JESD79D, "Double Data Rate (DDR) SDRAM Specification." published February 2004.</p> <p><u>File Histories</u></p> <p>File histories of U.S. Patents: No. 7619912, No. 7286436, No. 7289386, No. 7532537, No. 7636274, No. 8154901, No. 8001434, No. 8417870, No. 7864627, No. 7881150, No. 8516185, No. 7965578, No. 8081535, No. 7916574, No. 7965579, No. 8072837, No. 8081536, No. 8081537, No. 8359501, No. 8756364, No. 8516188, No. 8787060, No. 8782350, No. 8689064, No. 9128632, No. 9606907, No. 9037774, No. 10217523, No. 9037809, No. 9318160, No. 9858215, No. 9846659, No. 11093417, No. 10902886, No. 10860506, No. 10489314, No. 10268608, No. 10290328, No. 10949339, No. 9824035, No. 9659601, No. 9563587, No. 10025731, No. 61409893</p> <p>File histories of U.S. Patent Applications: No. 2022/0208233, No. 2021/0382834, No. 2021/0271593, No. 2021/0149829, No. 2019/0295675, No. 2021/0225415</p> <p><u>Inter Partes Reviews</u></p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		<p>IPR2014-00882 (<i>see, e.g.</i>, POPR (Paper 9) at 5, 17), IPR2014-00883 (<i>see, e.g.</i>, POPR (Paper 8) at 5-7, 15; POR (Paper 25) at 26), IPR2014-00970, IPR2014-00971, IPR2014-01011, IPR2014-01029, IPR2014-01369, IPR2014-01370, IPR2014-01371, IPR2014-01372, IPR2014-01373, IPR2014-01374, IPR2014-01375, IPR2015-01020, IPR2015-01021, IPR2017-00548, IPR2017-00549, IPR2017-00560, IPR2017-00561, IPR2017-00562, IPR2017-00577, IPR2017-00587, IPR2017-00667, IPR2017-00668, IPR2017-00692, IPR2017-00730, IPR2018-00303, IPR2018-00362, IPR2018-00363, IPR2018-00364, IPR2018-00365, IPR2020-01042, IPR2020-01044, IPR2020-01421, IPR2022-00062, IPR2022-00063, IPR2022-00064, IPR2022-00236, IPR2022-00237, IPR2022-00615, IPR2022-00639, IPR2022-00711, IPR2022-00744, IPR2022-00745, IPR2022-00996, IPR2022-00999, IPR2022-01427, IPR2022-01428, IPR2023-00203, IPR2023-00204, IPR2023-00205, IPR2023-00405, IPR2023-00406, IPR2023-00454, IPR2023-00455, IPR2023-00847, IPR2023-00883</p> <p><u>Inter Partes Reexaminations</u></p> <p>No. 95/000546, No. 95/000577, No. 95/000578, No. 95/000579, No. 95/001337, No. 95/001339, No. 95/001381, No. 95/001758</p> <p><u>Federal Circuit Appeals</u></p> <p>No. 15-126, No. 15-1179, No. 16-1742 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-1743 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-1744 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-2274, No. 16-2666, No. 17-1617, No. 17-1618, No. 18-1676, No. 18-2034, No. 18-2036, No. 18-2037, No. 18-2123, No. 18-2357, No. 19-1720, No. 19-2340, No. 20-1026, No. 21-113, No. 21-114</p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		<p><u>Extrinsic Evidence</u></p> <p><u>District Court Cases</u></p> <p>No. 2:09-cv-06900 (C.D. Cal.), No. 8:13-cv-00996 (C.D. Cal.), No. 8:16-cv-01605 (C.D. Cal.), No. 8:17-cv-01030 (C.D. Cal.), No. 2:12-cv-02319 (E.D. Cal.), No. 2:13-cv-02613 (E.D. Cal.), No. 3:09-cv-05718 (N.D. Cal.) (<i>see, e.g.</i>, Dkt. No. 45, Exhibit A at 1), No. 4:08-cv-04144 (N.D. Cal.), No. 4:13-cv-03901 (N.D. Cal.), No. 4:13-cv-03916 (N.D. Cal.), No. 4:13-cv-05889 (N.D. Cal.), No. 4:13-cv-05962 (N.D. Cal.), No. 5:22-mc-80337 (N.D. Cal.), No. 1:09-cv-00165 (D. Del.), No. 1:21-cv-01453 (D. Del.), No. 2:21-cv-00463 (E.D. Tex.), No. 2:22-cv-00203 (E.D. Tex.), No. 2:22-cv-00294 (E.D. Tex.), No. 1:22-cv-00134 (W.D. Tex.), No. 1:22-cv-00136 (W.D. Tex.), No. 6:20-cv-00194 (W.D. Tex.), No. 6:20-cv-00525 (W.D. Tex.), No. 6:21-cv-00430 (W.D. Tex.), No. 6:21-cv-00431 (W.D. Tex.)</p> <p><u>International Trade Commission Investigations</u></p> <p>No. 337-TA-1023, No. 337-TA-1089</p> <p><u>Others</u></p> <p>JEDEC Standards: JESD 205 Standard, JESD 82-20A Standard, JESD 206 Standard, JESD 79-2F Standard, JEDEC Standard No. 21C, JEDEC No. 21C Specification for DDR3 LRDIMM, JESD 82-30 Standard, JESD 79-3F Standard, JESD 248A Standard, JESD 79-4 Standard, JESD 82-31A Standard, JESD 79-4-1B Standard, JESD 79-4C Standard</p> <p>Memory Systems: Cache, DRAM, Disk (Bruce Jacob) (2008)</p> <p>Synchronous DRAM Architectures, Organizations, and Alternative Technologies (Bruce Jacob) (December 10, 2002)</p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		<p>The Penguin Dictionary of Electronics ("signal")</p> <p>Collins Dictionary Electronics: Definitions for the Digital Age ("signal")</p> <p>Microsoft Computer Dictionary, Fifth edition 2002 ("signal")</p> <p>Newton's Telecom Dictionary, 19th Edition, at p. 721 ("signal") (2003)</p> <p>Micron may rely on testimony of Dr. Harold Stone to explain the technology, state of the art at the time the applications leading to the '912 patent was filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Micron may also rely on extrinsic evidence identified by Plaintiff or Samsung Defendants in the Lead Case, including but not limited to, any expert testimony.</p>

'215 Patent

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
'215: 1, 21	<p>Preambles:</p> <p>"A memory module operable in a computer system to communicate data with a memory controller of the computer system via a memory bus in response to memory</p>	<p>The preambles are limiting.</p> <p><u>Intrinsic Evidence</u></p> <p><u>U.S. Patent No. 9858215</u></p> <p>1:42-45; 1:47-53; 2:28-36; 2:59-67; 5:18-32; 5:55-63; 6:24-39; 6:60-7:13; 7:14-29; 7:30-39; 8:12-14; 8:27-33; 9:18-35; 9:43-55; 9:56-64; 11:49-55; 11:66-12:4; 12:5-12; 12:13-21; 13:36-49; 14:19-36; 15:4-11; 15:21-29; 15:30-36; 15:46-51; 15:57-16:3; 16:4-11; 17:50-56; 18:55-62; 19:52-67; 20:1-11; 20:12-21; 20:22-24; 22:29-39; 22:42-53; 22:58-64; 23:10-16; 25:38-40;</p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
	<p>commands received from the memory controller, the memory commands including a first memory command and a subsequent second memory command, the first memory command to cause the memory module to receive or output a first data burst and the second memory command to cause the memory module to receive or output a second data burst, the memory module comprising:"; and</p> <p>"A method of operating a memory module coupled to a memory controller via a memory bus, the memory module comprising memory integrated circuits arranged in ranks and mounted on a printed circuit board having a plurality of edge connections coupled to the memory bus, the memory integrated circuits</p>	<p>26:62-65; 27:10-26; 27:67-28:5; 30:5-10; 33:23-29; 36:44-54; Figs. 1, 2, 3A, 3B, 4A, 4B, 8A, 8B, 8C, 8D, 9A, 9B, 10A, 10B, 17A, 17B</p> <p><u>File Histories</u></p> <p>File histories of U.S. Patents: No. 9858215, No. 7286436, No. 7289386, No. 7532537, No. 7619912, No. 7636274, No. 8154901, No. 8001434, No. 8417870, No. 7864627, No. 7881150, No. 8516185, No. 7965578, No. 8081535, No. 7916574, No. 7965579, No. 8072837, No. 8081536, No. 8081537, No. 8359501, No. 8756364, No. 8516188, No. 8787060, No. 8782350, No. 8689064, No. 9128632, No. 9606907, No. 9037774, No. 10217523, No. 9037809, No. 11093417, No. 9318160, No. 9846659, No. 10902886, No. 10860506, No. 10489314, No. 10268608, No. 10290328, No. 10949339, No. 9824035, No. 9659601, No. 9563587, No. 10025731, No. 61409893</p> <p>File histories of U.S. Patent Applications: No. 2022/0208233, No. 2021/0382834, No. 2021/0271593, No. 2021/0149829, No. 2019/0295675, No. 2021/0225415</p> <p><u>Inter Partes Reviews</u></p> <p>IPR2014-00882 (<i>see, e.g.</i>, POPR (Paper 9) at 5, 17), IPR2014-00883 (<i>see, e.g.</i>, POPR (Paper 8) at 5-7, 15; POR (Paper 25) at 26), IPR2014-00970, IPR2014-00971, IPR2014-01011, IPR2014-01029, IPR2014-01369, IPR2014-01370, IPR2014-01371, IPR2014-01372, IPR2014-01373, IPR2014-01374, IPR2014-01375, IPR2015-01020, IPR2015-01021, IPR2017-00548, IPR2017-00549, IPR2017-00560, IPR2017-00561, IPR2017-00562, IPR2017-00577, IPR2017-00587, IPR2017-00667, IPR2017-00668, IPR2017-00692, IPR2017-00730, IPR2018-00303, IPR2018-00362, IPR2018-00363, IPR2018-00364, IPR2018-00365, IPR2020-01042, IPR2020-01044, IPR2020-01421, IPR2022-00062, IPR2022-00063, IPR2022-00064, IPR2022-00236, IPR2022-00237, IPR2022-00615, IPR2022-00639, IPR2022-00711, IPR2022-00744, IPR2022-00745, IPR2022-00996, IPR2022-00999, IPR2022-01427, IPR2022-01428, IPR2023-00203, IPR2023-00204,</p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
	including at least one first memory integrated circuit in a first rank and at least one second memory integrated circuit in a second rank, the method comprising:"	<p>IPR2023-00205, IPR2023-00405, IPR2023-00406, IPR2023-00454, IPR2023-00455, IPR2023-00847, IPR2023-00883</p> <p><u>Inter Partes Reexaminations</u></p> <p>No. 95/000546, No. 95/000577, No. 95/000578, No. 95/000579, No. 95/001337, No. 95/001339, No. 95/001381, No. 95/001758</p> <p><u>Federal Circuit Appeals</u></p> <p>No. 15-126, No. 15-1179, No. 16-1742 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-1743 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-1744 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-2274, No. 16-2666, No. 17-1617, No. 17-1618, No. 18-1676, No. 18-2034, No. 18-2036, No. 18-2037, No. 18-2123, No. 18-2357, No. 19-1720, No. 19-2340, No. 20-1026, No. 21-113, No. 21-114</p> <p><u>Extrinsic Evidence</u></p> <p><u>District Court Cases</u></p> <p>No. 2:09-cv-06900 (C.D. Cal.), No. 8:13-cv-00996 (C.D. Cal.), No. 8:16-cv-01605 (C.D. Cal.), No. 8:17-cv-01030 (C.D. Cal.), No. 2:12-cv-02319 (E.D. Cal.), No. 2:13-cv-02613 (E.D. Cal.), No. 3:09-cv-05718 (N.D. Cal.), No. 4:08-cv-04144 (N.D. Cal.), No. 4:13-cv-03901 (N.D. Cal.), No. 4:13-cv-03916 (N.D. Cal.), No. 4:13-cv-05889 (N.D. Cal.), No. 4:13-cv-05962 (N.D. Cal.), No. 5:22-mc-80337 (N.D. Cal.), No. 1:09-cv-00165 (D. Del.), No. 1:21-cv-01453 (D. Del.), No. 2:21-cv-00463 (E.D. Tex.), No. 2:22-cv-00203 (E.D. Tex.), No. 2:22-cv-00294 (E.D. Tex.), No. 1:22-cv-00134 (W.D. Tex.), No. 1:22-cv-00136 (W.D. Tex.), No.</p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		<p>6:20-cv-00194 (W.D. Tex.), No. 6:20-cv-00525 (W.D. Tex.), No. 6:21-cv-00430 (W.D. Tex.), No. 6:21-cv-00431 (W.D. Tex.)</p> <p><u>International Trade Commission Investigations</u></p> <p>No. 337-TA-1023, No. 337-TA-1089</p> <p><u>Others</u></p> <p>JEDEC Standards: JEDEC Standard No. 21C, JEDEC 79-4C Standard, JEDEC 82-31A Standard, JEDEC 79-4-1B Standard, JEDEC 82-32A Standard, JEDEC 79-4C Standard, JESD 79 Standard, JESD 79-2 Standard</p> <p>Memory Systems: Cache, DRAM, Disk (Bruce Jacob) (2008)</p> <p>Synchronous DRAM Architectures, Organizations, and Alternative Technologies (Bruce Jacob) (December 10, 2002)</p> <p>Micron may rely on testimony of Dr. Harold Stone to explain the technology, state of the art at the time the applications leading to the '215 patent was filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Micron may also rely on extrinsic evidence identified by Plaintiff or Samsung Defendants in the Lead Case, including but not limited to, any expert testimony.</p>
'215: 1, 14, 21, 26	"rank"	<p>"an independent set of one or more memory devices on a memory module that act together in response to command signals, including chip-select signals, to read or write the full bit-width of the memory module"</p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		<p><u>Intrinsic Evidence</u></p> <p><u>U.S. Patent No. 9858215</u></p> <p>2:41-47; 2:59-63; 6:9-11; 6:30-36; 7:14-29; 8:12-26; 8:27-38; 9:18-35; 9:56-64; 12:13-17; 12:25-34; 12:35-43; 12:44-59; 12:60-67; 13:1-15; 15:30-56; 15:57-16:3; 16:4-20; 16:22-24; 16:42-62; 16:63-17:12; 17:13-15; 18:30-44; 19:52-67; 20:1-11; 20:12-21; 20:49-63; 20:64-21:6; 22:24-28; 22:35-41; 22:47-57; 27:10-33; 28:27-45; 28:56-29:8; 29:29-27-41; Tables 1, 2; Figs.1, 4A, 4B, 8A, 8B, 8C, 8D, 9A, 9B, 10A, 10B, 11A, 11B</p> <p><u>File Histories</u></p> <p>File histories of U.S. Patents: No. 9858215, No. 7286436, No. 7289386, No. 7532537, No. 7619912, No. 7636274, No. 8154901, No. 8001434, No. 8417870, No. 7864627, No. 7881150, No. 8516185, No. 7965578, No. 8081535, No. 7916574, No. 7965579, No. 8072837, No. 8081536, No. 8081537, No. 8359501, No. 8756364, No. 8516188, No. 8787060, No. 8782350, No. 8689064, No. 9128632, No. 9606907, No. 9037774, No. 10217523, No. 9037809, No. 11093417, No. 9318160, No. 9846659, No. 10902886, No. 10860506, No. 10489314, No. 10268608, No. 10290328, No. 10949339, No. 9824035, No. 9659601, No. 9563587, No. 10025731, No. 61409893</p> <p>File histories of U.S. Patent Applications: No. 2022/0208233, No. 2021/0382834, No. 2021/0271593, No. 2021/0149829, No. 2019/0295675, No. 2021/0225415</p> <p><u>Inter Partes Reviews</u></p> <p>IPR2014-00882 (<i>see, e.g.</i>, POPR (Paper 9) at 5, 17), IPR2014-00883 (<i>see, e.g.</i>, POPR (Paper 8) at 5-7, 15; POR (Paper 25) at 26), IPR2014-00970, IPR2014-00971, IPR2014-01011, IPR2014-01029, IPR2014-01369, IPR2014-01370, IPR2014-01371, IPR2014-01372, IPR2014-01373, IPR2014-01374, IPR2014-01375, IPR2015-01020, IPR2015-01021, IPR2017-00548, IPR2017-00549, IPR2017-00560, IPR2017-00561, IPR2017-00562,</p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		<p>IPR2017-00577, IPR2017-00587, IPR2017-00667, IPR2017-00668, IPR2017-00692, IPR2017-00730, IPR2018-00303, IPR2018-00362, IPR2018-00363, IPR2018-00364, IPR2018-00365, IPR2020-01042, IPR2020-01044, IPR2020-01421, IPR2022-00062, IPR2022-00063, IPR2022-00064, IPR2022-00236, IPR2022-00237, IPR2022-00615, IPR2022-00639, IPR2022-00711, IPR2022-00744, IPR2022-00745, IPR2022-00996, IPR2022-00999, IPR2022-01427, IPR2022-01428, IPR2023-00203, IPR2023-00204, IPR2023-00205, IPR2023-00405, IPR2023-00406, IPR2023-00454, IPR2023-00455, IPR2023-00847, IPR2023-00883</p> <p><u>Inter Partes Reexaminations</u></p> <p>No. 95/000546, No. 95/000577, No. 95/000578, No. 95/000579, No. 95/001337, No. 95/001339, No. 95/001381, No. 95/001758</p> <p><u>Federal Circuit Appeals</u></p> <p>No. 15-126, No. 15-1179, No. 16-1742 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-1743 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-1744 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-2274, No. 16-2666, No. 17-1617, No. 17-1618, No. 18-1676, No. 18-2034, No. 18-2036, No. 18-2037, No. 18-2123, No. 18-2357, No. 19-1720, No. 19-2340, No. 20-1026, No. 21-113, No. 21-114</p> <p><u>Extrinsic Evidence</u></p> <p><u>District Court Cases</u></p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		<p>No. 2:09-cv-06900 (C.D. Cal.), No. 8:13-cv-00996 (C.D. Cal.), No. 8:16-cv-01605 (C.D. Cal.), No. 8:17-cv-01030 (C.D. Cal.), No. 2:12-cv-02319 (E.D. Cal.), No. 2:13-cv-02613 (E.D. Cal.), No. 3:09-cv-05718 (N.D. Cal.), No. 4:08-cv-04144 (N.D. Cal.), No. 4:13-cv-03901 (N.D. Cal.), No. 4:13-cv-03916 (N.D. Cal.), No. 4:13-cv-05889 (N.D. Cal.), No. 4:13-cv-05962 (N.D. Cal.), No. 5:22-mc-80337 (N.D. Cal.), No. 1:09-cv-00165 (D. Del.), No. 1:21-cv-01453 (D. Del.), No. 2:21-cv-00463 (E.D. Tex.), No. 2:22-cv-00203 (E.D. Tex.), No. 2:22-cv-00294 (E.D. Tex.), No. 1:22-cv-00134 (W.D. Tex.), No. 1:22-cv-00136 (W.D. Tex.), No. 6:20-cv-00194 (W.D. Tex.), No. 6:20-cv-00525 (W.D. Tex.), No. 6:21-cv-00430 (W.D. Tex.), No. 6:21-cv-00431 (W.D. Tex.)</p> <p><u>International Trade Commission Investigations</u></p> <p>No. 337-TA-1023, No. 337-TA-1089</p> <p><u>Others</u></p> <p>JEDEC Standards: JEDEC Standard No. 21C, JEDEC 79-4C Standard, JEDEC 82-31A Standard, JEDEC 79-4-1B Standard, JEDEC 82-32A Standard, JEDEC 79-4C Standard, JESD 79 Standard, JESD 79-2 Standard</p> <p>Memory Systems: Cache, DRAM, Disk (Bruce Jacob) (2008)</p> <p>Synchronous DRAM Architectures, Organizations, and Alternative Technologies (Bruce Jacob) (December 10, 2002)</p> <p>Micron may rely on testimony of Dr. Harold Stone to explain the technology, state of the art at the time the applications leading to the '215 patent was filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		Micron may also rely on extrinsic evidence identified by Plaintiff or Samsung Defendants in the Lead Case, including but not limited to, any expert testimony.
'215: 1	"operable in a computer system to communicate data"	<p data-bbox="762 431 1482 464">"configured in a computer system to communicate data"</p> <p data-bbox="762 500 1014 532"><u>Intrinsic Evidence</u></p> <p data-bbox="762 568 1083 600"><u>U.S. Patent No. 9858215</u></p> <p data-bbox="762 636 1944 841">1:47-53; 2:28-36; 2:59-67; 5:18-32; 5:55-63; 6:24-39; 6:60-7:13; 7:14-29; 7:30-39; 8:12-14; 8:27-33; 9:18-35; 9:43-55; 9:56-64; 11:49-55; 11:66-12:4; 12:5-12; 12:13-21; 13:36-49; 14:19-36; 15:4-11; 15:21-29; 15:30-36; 15:46-51; 15:57-16:3; 16:4-11; 17:50-56; 18:55-62; 19:52-67; 20:1-11; 20:12-21; 20:22-24; 22:29-39; 22:42-53; 22:58-64; 23:10-16; 25:38-40; 26:62-65; 27:10-26; 27:67-28:5; 30:5-10; 33:23-29; 36:44-54; Examples 2, 3; Figs. 1, 2, 3A, 3B, 4A, 4B, 8A, 8B, 8C, 8D, 9A, 9B, 10A, 10B, 17A, 17B</p> <p data-bbox="762 876 936 909"><u>File Histories</u></p> <p data-bbox="762 945 1927 1237">File histories of U.S. Patents: No. 9858215, No. 7286436, No. 7289386, No. 7532537, No. 7619912, No. 7636274, No. 8154901, No. 8001434, No. 8417870, No. 7864627, No. 7881150, No. 8516185, No. 7965578, No. 8081535, No. 7916574, No. 7965579, No. 8072837, No. 8081536, No. 8081537, No. 8359501, No. 8756364, No. 8516188, No. 8787060, No. 8782350, No. 8689064, No. 9128632, No. 9606907, No. 9037774, No. 10217523, No. 9037809, No. 11093417, No. 9318160, No. 9846659, No. 10902886, No. 10860506, No. 10489314, No. 10268608, No. 10290328, No. 10949339, No. 9824035, No. 9659601, No. 9563587, No. 10025731, No. 61409893</p> <p data-bbox="762 1273 1860 1351">File histories of U.S. Patent Applications: No. 2022/0208233, No. 2021/0382834, No. 2021/0271593, No. 2021/0149829, No. 2019/0295675, No. 2021/0225415</p> <p data-bbox="762 1386 1035 1419"><u>Inter Partes Reviews</u></p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		<p>IPR2014-00882 (<i>see, e.g.</i>, POPR (Paper 9) at 5, 17), IPR2014-00883 (<i>see, e.g.</i>, POPR (Paper 8) at 5-7, 15; POR (Paper 25) at 26), IPR2014-00970, IPR2014-00971, IPR2014-01011, IPR2014-01029, IPR2014-01369, IPR2014-01370, IPR2014-01371, IPR2014-01372, IPR2014-01373, IPR2014-01374, IPR2014-01375, IPR2015-01020, IPR2015-01021, IPR2017-00548, IPR2017-00549, IPR2017-00560, IPR2017-00561, IPR2017-00562, IPR2017-00577, IPR2017-00587, IPR2017-00667, IPR2017-00668, IPR2017-00692, IPR2017-00730, IPR2018-00303, IPR2018-00362, IPR2018-00363, IPR2018-00364, IPR2018-00365, IPR2020-01042, IPR2020-01044, IPR2020-01421, IPR2022-00062, IPR2022-00063, IPR2022-00064, IPR2022-00236, IPR2022-00237, IPR2022-00615, IPR2022-00639, IPR2022-00711, IPR2022-00744, IPR2022-00745, IPR2022-00996, IPR2022-00999, IPR2022-01427, IPR2022-01428, IPR2023-00203, IPR2023-00204, IPR2023-00205, IPR2023-00405, IPR2023-00406, IPR2023-00454, IPR2023-00455, IPR2023-00847, IPR2023-00883</p> <p><u><i>Inter Partes</i> Reexaminations</u></p> <p>No. 95/000546, No. 95/000577, No. 95/000578, No. 95/000579, No. 95/001337, No. 95/001339, No. 95/001381, No. 95/001758</p> <p><u>Extrinsic Evidence</u></p> <p><u>District Court Cases</u></p> <p>No. 2:09-cv-06900 (C.D. Cal.), No. 8:13-cv-00996 (C.D. Cal.), No. 8:16-cv-01605 (C.D. Cal.), No. 8:17-cv-01030 (C.D. Cal.), No. 2:12-cv-02319 (E.D. Cal.), No. 2:13-cv-02613 (E.D. Cal.), No. 3:09-cv-05718 (N.D. Cal.), No. 4:08-cv-04144 (N.D. Cal.), No. 4:13-cv-03901 (N.D. Cal.), No. 4:13-cv-03916 (N.D. Cal.), No. 4:13-cv-05889 (N.D. Cal.), No. 4:13-cv-05962 (N.D. Cal.), No. 5:22-mc-80337 (N.D. Cal.), No. 1:09-cv-00165 (D. Del.), No. 1:21-cv-01453 (D. Del.), No. 2:21-cv-00463 (E.D. Tex.), No. 2:22-cv-00203 (E.D. Tex.), No. 2:22-cv-</p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		<p>00294 (E.D. Tex.), No. 1:22-cv-00134 (W.D. Tex.), No. 1:22-cv-00136 (W.D. Tex.), No. 6:20-cv-00194 (W.D. Tex.), No. 6:20-cv-00525 (W.D. Tex.), No. 6:21-cv-00430 (W.D. Tex.), No. 6:21-cv-00431 (W.D. Tex.)</p> <p><u>International Trade Commission Investigations</u></p> <p>No. 337-TA-1023, No. 337-TA-1089</p> <p><u>Federal Circuit Appeals</u></p> <p>No. 15-126, No. 15-1179, No. 16-1742 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-1743 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-1744 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-2274, No. 16-2666, No. 17-1617, No. 17-1618, No. 18-1676, No. 18-2034, No. 18-2036, No. 18-2037, No. 18-2123, No. 18-2357, No. 19-1720, No. 19-2340, No. 20-1026, No. 21-113, No. 21-114</p> <p><u>Others</u></p> <p>JEDEC Standards: JEDEC Standard No. 21C, JEDEC 79-4C Standard, JEDEC 82-31A Standard, JEDEC 79-4-1B Standard, JEDEC 82-32A Standard, JEDEC 79-4C Standard, JESD 79 Standard, JESD 79-2 Standard</p> <p>Memory Systems: Cache, DRAM, Disk (Bruce Jacob) (2008)</p> <p>Synchronous DRAM Architectures, Organizations, and Alternative Technologies (Bruce Jacob) (December 10, 2002)</p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		<p>Micron may rely on testimony of Dr. Harold Stone to explain the technology, state of the art at the time the applications leading to the '215 patent was filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Micron may also rely on extrinsic evidence identified by Plaintiff or Samsung Defendants in the Lead Case, including but not limited to, any expert testimony.</p>
'215: 1	<p>“logic . . . configured to respond to the first memory command by providing first control signals to the buffer to enable communication of the first data burst between the at least one first memory integrated circuit and the memory controller through the buffer, wherein the logic is further configured to respond to the second memory command by providing second control signals to the buffer to enable communication of the second data burst between the at least one second memory integrated circuit and the memory controller</p>	<p>The identified “logic” features in claim 1 are indefinite.</p> <p>For claim 1, the “logic” features are subject to §112, ¶ 6, but there is no disclosure of adequate structure or algorithm for the functions of:</p> <p>(i) respond[ing] to the first memory command by providing first control signals to the buffer to enable communication of the first data burst between the at least one first memory integrated circuit and the memory controller through the buffer; and</p> <p>(ii) further respond[ing] to the second memory command by providing second control signals to the buffer to enable communication of the second data burst between the at least one second memory integrated circuit and the memory controller through the buffer.</p> <p><u>Intrinsic Evidence</u></p> <p>No intrinsic evidence because there is no corresponding structure.</p> <p><u>Extrinsic Evidence</u></p> <p>Micron may rely on testimony of Dr. Harold Stone to explain the technology, state of the art at the time the applications leading to the '215 patent was filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
	through the buffer"	Micron may also rely on extrinsic evidence identified by Plaintiff or Samsung Defendants in the Lead Case, including but not limited to, any expert testimony.
'215: 3, 4, 24, 25	"the memory module has an overall CAS latency" / "overall CAS latency of the memory module"	<p data-bbox="762 428 1974 527">"the delay between: (1) the time when a read command is executed by the memory module, and (2) the time when the first piece of data is made available at an output of the memory module"</p> <p data-bbox="762 565 1014 602"><u>Intrinsic Evidence</u></p> <p data-bbox="762 634 1083 667"><u>U.S. Patent No. 9858215</u></p> <p data-bbox="762 703 877 735">20:22-47</p> <p data-bbox="762 771 1020 808"><u>Extrinsic Evidence</u></p> <p data-bbox="762 844 1961 1096">JEDEC Standard, DDR SDRAM Specification, JESD79 (Jun. 2000) (MICNL294-00063707); JEDEC Standard, DDR2 SDRAM Specification, JESD79-2 (Sep. 2003) (MICNL294-00063784); JEDEC Standard, DDR2 SDRAM Specification, JESD79-2A (Jan. 2004) (MICNL294-00063864); DDR SDRAM Registered DIMM Design Specification, Standard No. 21-C, JEDEC Solid State Tech. Corp. (Rev. 1.3, Jan. 2002) (MICNL294-00063625); and Micron Technical Note, DDR2 Posted CAS# Additive Latency (2003) (MICNL294-00063622)</p> <p data-bbox="762 1133 1974 1317">Micron may rely on testimony of Dr. Harold Stone to explain the technology, state of the art at the time the applications leading to the '215 patent was filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p data-bbox="762 1354 1944 1421">Micron may also rely on extrinsic evidence identified by Plaintiff or Samsung Defendants in the Lead Case, including but not limited to, any expert testimony.</p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
'215: 3, 4, 24, 25	“actual operational CAS latency of each of the plurality of memory integrated circuits” / “actual operational CAS latency of the memory integrated circuits”	<p>“the delay between: (1) the time when a read command is executed by each of the plurality of memory integrated circuits, and (2) the time when the first piece of data is made available at an output of each of the plurality of memory integrated circuits” / “the delay between: (1) the time when a read command is executed by the memory integrated circuits, and (2) the time when the first piece of data is made available at an output of the memory integrated circuits”</p> <p><u>Intrinsic Evidence</u></p> <p><u>U.S. Patent No. 9858215</u></p> <p>20:22-47</p> <p><u>Extrinsic Evidence</u></p> <p>JEDEC Standard, DDR SDRAM Specification, JESD79 (Jun. 2000) (MICNL294-00063707); JEDEC Standard, DDR2 SDRAM Specification, JESD79-2 (Sep. 2003) (MICNL294-00063784); JEDEC Standard, DDR2 SDRAM Specification, JESD79-2A (Jan. 2004) (MICNL294-00063864); DDR SDRAM Registered DIMM Design Specification, Standard No. 21-C, JEDEC Solid State Tech. Corp. (Rev. 1.3, Jan. 2002) (MICNL294-00063625); and Micron Technical Note, DDR2 Posted CAS# Additive Latency (2003) (MICNL294-00063622)</p> <p>Micron may rely on testimony of Dr. Harold Stone to explain the technology, state of the art at the time the applications leading to the '215 patent was filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Micron may also rely on extrinsic evidence identified by Plaintiff or Samsung Defendants in the Lead Case, including but not limited to, any expert testimony.</p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
'215 patent: 12, 13, 28, 29	"burst of data strobe signals"	<p>Indefinite</p> <p><u>Intrinsic Evidence</u></p> <p><u>U.S. Patent No. 9858215</u></p> <p>11:38-57; Figs. 1, 6A, 6B, 7, 18, 19</p> <p><u>Extrinsic Evidence</u></p> <p>Micron may rely on testimony of Dr. Harold Stone to explain the technology, state of the art at the time the applications leading to the '215 patent was filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Micron may also rely on extrinsic evidence identified by Plaintiff or Samsung Defendants in the Lead Case, including but not limited to, any expert testimony.</p>
'215: 15	"the at least one of the circuit components"	<p>Indefinite</p> <p><u>Extrinsic Evidence</u></p> <p>Micron may rely on testimony of Dr. Harold Stone to explain the technology, state of the art at the time the applications leading to the '215 patent was filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Micron may also rely on extrinsic evidence identified by Plaintiff or Samsung Defendants in the Lead Case, including but not limited to, any expert testimony.</p>

'417 Patent

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
'417: 1	<p>Preamble:</p> <p>“A memory module operable in a computer system to communicate data with a memory controller of the computer system via a N-bit wide memory bus in response to read or write memory commands received from the memory controller, the memory bus including address and control signal lines and data signal lines, the memory module comprising:”</p>	<p>The preamble is limiting.</p> <p><u>Intrinsic Evidence</u></p> <p><u>U.S. Patent No. 11093417</u></p> <p>1:54-63; 2:34-46; 2:65-3:6; 5:65-6:12; 6:35-50; 7:4-9; 7:40-60; 7:61-8:9; 8:10-32; 8:33-58; 8:59-9:6; 9:7-36; 10:5-30; 10:31-43; 10:44-52; 13:26-45; 13:45-59; 13:60-67; 14:25-36; 15:48-61; 16:31-48; 16:49-17:5; 17:16-24; 17:35-43; 17:44-18:3; 18:4-18; 18:19-35; 19:56-20:3; 20:44-21:9; 21:66-22:14; 22:15-25; 22:26-35; 22:36-62; 23:12-21; 24:26-41; 24:42-54; 24:55-25:3; 25:4-26:6; 26:7-14; 29:21-30:22; 31:29-44; 31:35-32:30; 32:61-33:6; 35:1-28; 38:18-37; 41:39-51; Figs. 1, 2, 3A, 3B, 4A, 4B, 8A, 8B, 8C, 8D, 9A, 9B, 10A, 10B, 17A, 17B.</p> <p><u>File Histories</u></p> <p>File histories of U.S. Patents: No. 11093417, No. 7286436, No. 7289386, No. 7532537, No. 7619912, No. 7636274, No. 8154901, No. 8001434, No. 8417870, No. 7864627, No. 7881150, No. 8516185, No. 7965578, No. 8081535, No. 7916574, No. 7965579, No. 8072837, No. 8081536, No. 8081537, No. 8359501, No. 8756364, No. 8516188, No. 8787060, No. 8782350, No. 8689064, No. 9128632, No. 9606907, No. 9037774, No. 10217523, No. 9037809, No. 9318160, No. 9858215, No. 9846659, No. 10902886, No. 10860506, No. 10489314, No. 10268608, No. 10290328, No. 10949339, No. 9824035, No. 9659601, No. 9563587, No. 10025731, No. 61409893</p> <p>File histories of U.S. Patent Applications: No. 2022/0208233, No. 2021/0382834, No. 2021/0271593, No. 2021/0149829, No. 2019/0295675, No. 2021/0225415</p> <p><u>Inter Partes Reviews</u></p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		<p>IPR2014-00882 (<i>see, e.g.</i>, POPR (Paper 9) at 5, 17), IPR2014-00883 (<i>see, e.g.</i>, POPR (Paper 8) at 5-7, 15; POR (Paper 25) at 26), IPR2014-00970, IPR2014-00971, IPR2014-01011, IPR2014-01029, IPR2014-01369, IPR2014-01370, IPR2014-01371, IPR2014-01372, IPR2014-01373, IPR2014-01374, IPR2014-01375, IPR2015-01020, IPR2015-01021, IPR2017-00548, IPR2017-00549, IPR2017-00560, IPR2017-00561, IPR2017-00562, IPR2017-00577, IPR2017-00587, IPR2017-00667, IPR2017-00668, IPR2017-00692, IPR2017-00730, IPR2018-00303, IPR2018-00362, IPR2018-00363, IPR2018-00364, IPR2018-00365, IPR2020-01042, IPR2020-01044, IPR2020-01421, IPR2022-00062, IPR2022-00063, IPR2022-00064, IPR2022-00236, IPR2022-00237, IPR2022-00615, IPR2022-00639, IPR2022-00711, IPR2022-00744, IPR2022-00745, IPR2022-00996, IPR2022-00999, IPR2022-01427, IPR2022-01428, IPR2023-00203, IPR2023-00204, IPR2023-00205, IPR2023-00405, IPR2023-00406, IPR2023-00454, IPR2023-00455, IPR2023-00847, IPR2023-00883</p> <p><u>Inter Partes Reexaminations</u></p> <p>No. 95/000546, No. 95/000577, No. 95/000578, No. 95/000579, No. 95/001337, No. 95/001339, No. 95/001381, No. 95/001758</p> <p><u>Federal Circuit Appeals</u></p> <p>No. 15-126, No. 15-1179, No. 16-1742 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-1743 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-1744 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-2274, No. 16-2666, No. 17-1617, No. 17-1618, No. 18-1676, No. 18-2034, No. 18-2036, No. 18-2037, No. 18-2123, No. 18-2357, No. 19-1720, No. 19-2340, No. 20-1026, No. 21-113, No. 21-114</p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		<p><u>Extrinsic Evidence</u></p> <p><u>District Court Cases</u></p> <p>No. 2:09-cv-06900 (C.D. Cal.), No. 8:13-cv-00996 (C.D. Cal.), No. 8:16-cv-01605 (C.D. Cal.), No. 8:17-cv-01030 (C.D. Cal.), No. 2:12-cv-02319 (E.D. Cal.), No. 2:13-cv-02613 (E.D. Cal.), No. 3:09-cv-05718 (N.D. Cal.), No. 4:08-cv-04144 (N.D. Cal.), No. 4:13-cv-03901 (N.D. Cal.), No. 4:13-cv-03916 (N.D. Cal.), No. 4:13-cv-05889 (N.D. Cal.), No. 4:13-cv-05962 (N.D. Cal.), No. 5:22-mc-80337 (N.D. Cal.), No. 1:09-cv-00165 (D. Del.), No. 1:21-cv-01453 (D. Del.), No. 2:21-cv-00463 (E.D. Tex.), No. 2:22-cv-00203 (E.D. Tex.), No. 2:22-cv-00294 (E.D. Tex.), No. 1:22-cv-00134 (W.D. Tex.), No. 1:22-cv-00136 (W.D. Tex.), No. 6:20-cv-00194 (W.D. Tex.), No. 6:20-cv-00525 (W.D. Tex.), No. 6:21-cv-00430 (W.D. Tex.), No. 6:21-cv-00431 (W.D. Tex.)</p> <p><u>International Trade Commission Investigations</u></p> <p>No. 337-TA-1023, No. 337-TA-1089</p> <p><u>Others</u></p> <p>JEDEC Standards: JEDEC Standard No. 21C, JESD 79-4 Standard, JEDEC 82-31A Standard, JEDEC 82-32A Standard, JESD 248A Standard, JEDEC 79-4C Standard, JESD 79 Standard, JESD 79-2 Standard</p> <p>Memory Systems: Cache, DRAM, Disk (Bruce Jacob) (2008)</p> <p>Synchronous DRAM Architectures, Organizations, and Alternative Technologies (Bruce Jacob) (December 10, 2002)</p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		<p>Micron may rely on testimony of Dr. Harold Stone to explain the technology, state of the art at the time the applications leading to the '417 patent was filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Micron may also rely on extrinsic evidence identified by Plaintiff or Samsung Defendants in the Lead Case, including but not limited to, any expert testimony.</p>
'417: 1	"operable in a computer system to communicate data"	<p>"configured in a computer system to communicate data"</p> <p><u>Intrinsic Evidence</u></p> <p><u>U.S. Patent No. 11093417</u></p> <p>1:54-63; 2:34-46; 2:65-3:6; 5:65-6:12; 6:35-50; 7:4-9; 7:40-60; 7:61-8:9; 8:10-32; 8:59-9:6; 9:7-36; 10:5-30; 10:31-43; 10:44-52; 13:26-45; 13:45-59; 13:60-67; 14:25-36; 15:48-61; 16:31-48; 17:16-24; 17:35-43; 17:44-18:3; 18:4-18; 18:19-35; 19:56-20:3; 20:44-21:9; 21:66-22:14; 22:15-25; 22:26-35; 22:36-62; 23:12-21; 24:26-41; 24:42-54; 24:55-25:3; 25:4-26:6; 26:7-14; 29:21-30:22; 31:29-44; 31:35-32:30; 32:61-33:6; 35:2-28; 38:18-37; 41:39-51; Figs. 1, 2, 3A, 3B, 4A, 4B, 8A, 8B, 9A, 9B, 17A, 17B.</p> <p><u>File Histories</u></p> <p>File histories of U.S. Patents: No. 11093417, No. 7286436, No. 7289386, No. 7532537, No. 7619912, No. 7636274, No. 8154901, No. 8001434, No. 8417870, No. 7864627, No. 7881150, No. 8516185, No. 7965578, No. 8081535, No. 7916574, No. 7965579, No. 8072837, No. 8081536, No. 8081537, No. 8359501, No. 8756364, No. 8516188, No. 8787060, No. 8782350, No. 8689064, No. 9128632, No. 9606907, No. 9037774, No. 10217523, No. 9037809, No. 9318160, No. 9858215, No. 9846659, No. 10902886, No.</p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		<p>10860506, No. 10489314, No. 10268608, No. 10290328, No. 10949339, No. 9824035, No. 9659601, No. 9563587, No. 10025731, No. 61409893</p> <p>File histories of U.S. Patent Applications: No. 2022/0208233, No. 2021/0382834, No. 2021/0271593, No. 2021/0149829, No. 2019/0295675, No. 2021/0225415</p> <p><u>Inter Partes Reviews</u></p> <p>IPR2014-00882 (<i>see, e.g.</i>, POPR (Paper 9) at 5, 17), IPR2014-00883 (<i>see, e.g.</i>, POPR (Paper 8) at 5-7, 15; POR (Paper 25) at 26), IPR2014-00970, IPR2014-00971, IPR2014-01011, IPR2014-01029, IPR2014-01369, IPR2014-01370, IPR2014-01371, IPR2014-01372, IPR2014-01373, IPR2014-01374, IPR2014-01375, IPR2015-01020, IPR2015-01021, IPR2017-00548, IPR2017-00549, IPR2017-00560, IPR2017-00561, IPR2017-00562, IPR2017-00577, IPR2017-00587, IPR2017-00667, IPR2017-00668, IPR2017-00692, IPR2017-00730, IPR2018-00303, IPR2018-00362, IPR2018-00363, IPR2018-00364, IPR2018-00365, IPR2020-01042, IPR2020-01044, IPR2020-01421, IPR2022-00062, IPR2022-00063, IPR2022-00064, IPR2022-00236, IPR2022-00237, IPR2022-00615, IPR2022-00639, IPR2022-00711, IPR2022-00744, IPR2022-00745, IPR2022-00996, IPR2022-00999, IPR2022-01427, IPR2022-01428, IPR2023-00203, IPR2023-00204, IPR2023-00205, IPR2023-00405, IPR2023-00406, IPR2023-00454, IPR2023-00455, IPR2023-00847, IPR2023-00883</p> <p><u>Inter Partes Reexaminations</u></p> <p>No. 95/000546, No. 95/000577, No. 95/000578, No. 95/000579, No. 95/001337, No. 95/001339, No. 95/001381, No. 95/001758</p> <p><u>Federal Circuit Appeals</u></p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		<p>No. 15-126, No. 15-1179, No. 16-1742 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-1743 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-1744 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-2274, No. 16-2666, No. 17-1617, No. 17-1618, No. 18-1676, No. 18-2034, No. 18-2036, No. 18-2037, No. 18-2123, No. 18-2357, No. 19-1720, No. 19-2340, No. 20-1026, No. 21-113, No. 21-114</p> <p><u>Extrinsic Evidence</u></p> <p><u>District Court Cases</u></p> <p>No. 2:09-cv-06900 (C.D. Cal.), No. 8:13-cv-00996 (C.D. Cal.), No. 8:16-cv-01605 (C.D. Cal.), No. 8:17-cv-01030 (C.D. Cal.), No. 2:12-cv-02319 (E.D. Cal.), No. 2:13-cv-02613 (E.D. Cal.), No. 3:09-cv-05718 (N.D. Cal.), No. 4:08-cv-04144 (N.D. Cal.), No. 4:13-cv-03901 (N.D. Cal.), No. 4:13-cv-03916 (N.D. Cal.), No. 4:13-cv-05889 (N.D. Cal.), No. 4:13-cv-05962 (N.D. Cal.), No. 5:22-mc-80337 (N.D. Cal.), No. 1:09-cv-00165 (D. Del.), No. 1:21-cv-01453 (D. Del.), No. 2:21-cv-00463 (E.D. Tex.), No. 2:22-cv-00203 (E.D. Tex.), No. 2:22-cv-00294 (E.D. Tex.), No. 1:22-cv-00134 (W.D. Tex.), No. 1:22-cv-00136 (W.D. Tex.), No. 6:20-cv-00194 (W.D. Tex.), No. 6:20-cv-00525 (W.D. Tex.), No. 6:21-cv-00430 (W.D. Tex.), No. 6:21-cv-00431 (W.D. Tex.)</p> <p><u>International Trade Commission Investigations</u></p> <p>No. 337-TA-1023, No. 337-TA-1089</p> <p><u>Others</u></p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		<p>JEDEC Standards: JEDEC Standard No. 21C, JESD 79-4 Standard, JEDEC 82-31A Standard, JEDEC 82-32A Standard, JESD 248A Standard, JEDEC 79-4C Standard, JESD 79 Standard, JESD 79-2 Standard</p> <p>Memory Systems: Cache, DRAM, Disk (Bruce Jacob) (2008)</p> <p>Synchronous DRAM Architectures, Organizations, and Alternative Technologies (Bruce Jacob) (December 10, 2002)</p> <p>Micron may rely on testimony of Dr. Harold Stone to explain the technology, state of the art at the time the applications leading to the '417 patent was filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Micron may also rely on extrinsic evidence identified by Plaintiff or Samsung Defendants in the Lead Case, including but not limited to, any expert testimony.</p>
'417: 1, 4, 5, 8, 10	"rank"	<p>"an independent set of one or more memory devices on a memory module that act together in response to command signals, including chip-select signals, to read or write the full bit-width of the memory module"</p> <p><u>Intrinsic Evidence</u></p> <p><u>U.S. Patent No. 11093417</u></p> <p>2:46-53; 2:65-3:2; 6:51-58; 7:10-16; 7:61-8:9; 8:59-9:6; 9:7-18; 10:5-23; 10:44-52; 14:25-29; 14:37-46; 14:47-55; 14:56-15:4; 15:5-12; 15:13-27; 17:25-34; 17:44-18:3; 18:4-18; 18:19-35; 18:37-39; 18:56-19:10; 19:11-27; 19:28-30; 20:44-58; 21:66-22:14; 22:15-25; 22:26-35; 22:63-23:10; 31:45-32:30; 33:25-43; 33:54-34:6; 34:59-67; Tables 1, 2; Figs.1, 4A, 4B, 8A, 8B, 8C, 8D, 9A, 9B, 10A, 10B, 11A, 11B</p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		<p><u>File Histories</u></p> <p>File histories of U.S. Patents: No. 11093417, No. 7286436, No. 7289386, No. 7532537, No. 7619912, No. 7636274, No. 8154901, No. 8001434, No. 8417870, No. 7864627, No. 7881150, No. 8516185, No. 7965578, No. 8081535, No. 7916574, No. 7965579, No. 8072837, No. 8081536, No. 8081537, No. 8359501, No. 8756364, No. 8516188, No. 8787060, No. 8782350, No. 8689064, No. 9128632, No. 9606907, No. 9037774, No. 10217523, No. 9037809, No. 9318160, No. 9858215, No. 9846659, No. 10902886, No. 10860506, No. 10489314, No. 10268608, No. 10290328, No. 10949339, No. 9824035, No. 9659601, No. 9563587, No. 10025731, No. 61409893</p> <p>File histories of U.S. Patent Applications: No. 2022/0208233, No. 2021/0382834, No. 2021/0271593, No. 2021/0149829, No. 2019/0295675, No. 2021/0225415</p> <p><u>Inter Partes Reviews</u></p> <p>IPR2014-00882 (<i>see, e.g.</i>, POPR (Paper 9) at 5, 17), IPR2014-00883 (<i>see, e.g.</i>, POPR (Paper 8) at 5-7, 15; POR (Paper 25) at 26), IPR2014-00970, IPR2014-00971, IPR2014-01011, IPR2014-01029, IPR2014-01369, IPR2014-01370, IPR2014-01371, IPR2014-01372, IPR2014-01373, IPR2014-01374, IPR2014-01375, IPR2015-01020, IPR2015-01021, IPR2017-00548, IPR2017-00549, IPR2017-00560, IPR2017-00561, IPR2017-00562, IPR2017-00577, IPR2017-00587, IPR2017-00667, IPR2017-00668, IPR2017-00692, IPR2017-00730, IPR2018-00303, IPR2018-00362, IPR2018-00363, IPR2018-00364, IPR2018-00365, IPR2020-01042, IPR2020-01044, IPR2020-01421, IPR2022-00062, IPR2022-00063, IPR2022-00064, IPR2022-00236, IPR2022-00237, IPR2022-00615, IPR2022-00639, IPR2022-00711, IPR2022-00744, IPR2022-00745, IPR2022-00996, IPR2022-00999, IPR2022-01427, IPR2022-01428, IPR2023-00203, IPR2023-00204, IPR2023-00205, IPR2023-00405, IPR2023-00406, IPR2023-00454, IPR2023-00455, IPR2023-00847, IPR2023-00883</p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		<p><u>Inter Partes Reexaminations</u></p> <p>No. 95/000546, No. 95/000577, No. 95/000578, No. 95/000579, No. 95/001337, No. 95/001339, No. 95/001381, No. 95/001758</p> <p><u>Federal Circuit Appeals</u></p> <p>No. 15-126, No. 15-1179, No. 16-1742 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-1743 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-1744 (<i>see, e.g.</i>, Netlist Opening Brief (Dkt. No. 20) at 8-13, 30, 40-46; Netlist Reply Brief (Dkt. No. 32) at 15; Opinion and Judgment (Dkt. No. 44) at 2-3), No. 16-2274, No. 16-2666, No. 17-1617, No. 17-1618, No. 18-1676, No. 18-2034, No. 18-2036, No. 18-2037, No. 18-2123, No. 18-2357, No. 19-1720, No. 19-2340, No. 20-1026, No. 21-113, No. 21-114</p> <p><u>Extrinsic Evidence</u></p> <p><u>District Court Cases</u></p> <p>No. 2:09-cv-06900 (C.D. Cal.), No. 8:13-cv-00996 (C.D. Cal.), No. 8:16-cv-01605 (C.D. Cal.), No. 8:17-cv-01030 (C.D. Cal.), No. 2:12-cv-02319 (E.D. Cal.), No. 2:13-cv-02613 (E.D. Cal.), No. 3:09-cv-05718 (N.D. Cal.), No. 4:08-cv-04144 (N.D. Cal.), No. 4:13-cv-03901 (N.D. Cal.), No. 4:13-cv-03916 (N.D. Cal.), No. 4:13-cv-05889 (N.D. Cal.), No. 4:13-cv-05962 (N.D. Cal.), No. 5:22-mc-80337 (N.D. Cal.), No. 1:09-cv-00165 (D. Del.), No. 1:21-cv-01453 (D. Del.), No. 2:21-cv-00463 (E.D. Tex.), No. 2:22-cv-00203 (E.D. Tex.), No. 2:22-cv-00294 (E.D. Tex.), No. 1:22-cv-00134 (W.D. Tex.), No. 1:22-cv-00136 (W.D. Tex.), No. 6:20-cv-00194 (W.D. Tex.), No. 6:20-cv-00525 (W.D. Tex.), No. 6:21-cv-00430 (W.D. Tex.), No. 6:21-cv-00431 (W.D. Tex.)</p> <p><u>International Trade Commission Investigations</u></p>

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		<p>No. 337-TA-1023, No. 337-TA-1089</p> <p><u>Others</u></p> <p>JEDEC Standards: JEDEC Standard No. 21C, JESD 79-4 Standard, JEDEC 82-31A Standard, JEDEC 82-32A Standard, JESD 248A Standard, JEDEC 79-4C Standard, JESD 79 Standard, JESD 79-2 Standard</p> <p>Memory Systems: Cache, DRAM, Disk (Bruce Jacob) (2008)</p> <p>Synchronous DRAM Architectures, Organizations, and Alternative Technologies (Bruce Jacob) (December 10, 2002)</p> <p>Micron may rely on testimony of Dr. Harold Stone to explain the technology, state of the art at the time the applications leading to the '417 patent was filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Micron may also rely on extrinsic evidence identified by Plaintiff or Samsung Defendants in the Lead Case, including but not limited to, any expert testimony.</p>
'417: 1	<p>"circuitry . . . being configurable to transfer the burst of N-bit wide data signals between the N-bit wide memory bus and the memory devices in the one of the plurality of N-bit wide ranks in response to</p>	<p>The identified "circuitry" feature in claim 1 is indefinite.</p> <p>For claim 1, the "circuitry" feature is subject to §112, ¶ 6, but there is no disclosure of adequate structure or algorithm for the function of: transfer[ring] the burst of N-bit wide data signals between the N-bit wide memory bus and the memory devices in the one of the plurality of N-bit wide ranks in response to the data buffer control signal.</p> <p><u>Intrinsic Evidence</u></p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
	the data buffer control signals”	<p><u>U.S. Patent No. 11093417</u></p> <p>No intrinsic evidence because there is no corresponding structure.</p> <p><u>Extrinsic Evidence</u></p> <p>Micron may rely on testimony of Dr. Harold Stone to explain the technology, state of the art at the time the applications leading to the '417 patent was filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Micron may also rely on extrinsic evidence identified by Plaintiff or Samsung Defendants in the Lead Case, including but not limited to, any expert testimony.</p>
'417: 6, 11	<p>“circuitry includes logic pipelines configurable to enable the data transfers between the memory devices and the memory bus through the circuitry”</p> <p>“circuitry is configurable to enable the data paths in response to the data buffer control signals so that the burst of N-bit wide data signals are transferred via the data paths”</p>	<p>The identified “circuitry” features in claims 6 and 11 are indefinite.</p> <p>For claims 6 and 11, the “circuitry” features are subject to §112, ¶ 6, but there is no disclosure of adequate structure or algorithm for the functions of:</p> <p>(i) the circuitry (of claim 1) includ[ing] logic pipelines configur[ed] to enable the data transfers between the memory devices and the memory bus through the circuitry; and</p> <p>(ii) enabl[ing] the data paths in response to the data buffer control signals so that the burst of N-bit wide data signals are transferred via the data paths.</p> <p><u>Intrinsic Evidence</u></p> <p><u>U.S. Patent No. 11093417</u></p> <p>No intrinsic evidence because there is no corresponding structure.</p> <p><u>Extrinsic Evidence</u></p>

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		<p>Micron may rely on testimony of Dr. Harold Stone to explain the technology, state of the art at the time the applications leading to the '417 patent was filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Micron may also rely on extrinsic evidence identified by Plaintiff or Samsung Defendants in the Lead Case, including but not limited to, any expert testimony.</p>
'417: 1	<p>“logic . . . configurable to receive a set of input address and control signals associated with a read or write memory command via the address and control signal lines and to output a set of registered address and control signals in response to the set of input address and control signals, . . . the logic is further configurable to output data buffer control signals in response to the read or write memory command”</p>	<p>Plain and ordinary meaning.</p> <p><u>Intrinsic Evidence</u></p> <p><u>U.S. Patent No. 11093417</u></p> <p>No intrinsic evidence because there is no corresponding structure.</p> <p><u>Extrinsic Evidence</u></p> <p>Micron may rely on testimony of Dr. Harold Stone to explain the technology, state of the art at the time the applications leading to the '417 patent was filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Micron may also rely on extrinsic evidence identified by Plaintiff or Samsung Defendants in the Lead Case, including but not limited to, any expert testimony.</p>
'417: 1, 15	<p>“the read or write command”</p>	<p>“the read or write memory command”</p> <p><u>Intrinsic Evidence</u></p> <p><u>U.S. Patent No. 11093417</u></p>

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		<p>2:65-3:4; 8:26-32; 13:46-59; 19:11-24; 19:51-53; 22:53-56; 23:4-10; 25:4-26:3; 35:13-15; Table 2; Figs. 6A, 6B</p> <p><u>Extrinsic Evidence</u></p> <p>Micron may rely on testimony of Dr. Harold Stone to explain the technology, state of the art at the time the applications leading to the '417 patent was filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Micron may also rely on extrinsic evidence identified by Plaintiff or Samsung Defendants in the Lead Case, including but not limited to, any expert testimony.</p>
'417: 1	"overall CAS latency of the memory module"	<p>"the delay between: (1) the time when a read command is executed by the memory module, and (2) the time when the first piece of data is made available at an output of the memory module"</p> <p><u>Intrinsic Evidence</u></p> <p><u>U.S. Patent No. 11093417</u></p> <p>22:36-60</p> <p><u>Extrinsic Evidence</u></p> <p>Micron may rely on testimony of Dr. Harold Stone to explain the technology, state of the art at the time the applications leading to the '417 patent was filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p>

Claim(s)	Terms for Construction	Micron's Proposed Construction and Supporting Evidence
		Micron may also rely on extrinsic evidence identified by Plaintiff or Samsung Defendants in the Lead Case, including but not limited to, any expert testimony.
'417: 1	"actual operational CAS latency of each of the memory devices"	<p data-bbox="762 431 1976 537">"the delay between: (1) the time when a read command is executed by each of the memory devices, and (2) the time when the first piece of data is made available at an output of each of the memory devices"</p> <p data-bbox="762 565 1014 602"><u>Intrinsic Evidence</u></p> <p data-bbox="762 634 1098 672"><u>U.S. Patent No. 11093417</u></p> <p data-bbox="762 704 879 742">22:36-60</p> <p data-bbox="762 774 1020 812"><u>Extrinsic Evidence</u></p> <p data-bbox="762 844 1976 1027">Micron may rely on testimony of Dr. Harold Stone to explain the technology, state of the art at the time the applications leading to the '417 patent was filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p data-bbox="762 1060 1976 1138">Micron may also rely on extrinsic evidence identified by Plaintiff or Samsung Defendants in the Lead Case, including but not limited to, any expert testimony.</p>
'417: 1	"wherein data transfers through the circuitry are registered for an amount of time delay such that the overall CAS latency of the memory module is greater than an actual operational	<p data-bbox="762 1138 888 1175">Indefinite</p> <p data-bbox="762 1208 1020 1245"><u>Extrinsic Evidence</u></p> <p data-bbox="762 1278 1976 1390">Micron may rely on testimony of Dr. Harold Stone to explain the technology, state of the art at the time the applications leading to the '417 patent was filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the</p>

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	CAS latency of each of the memory devices”	<p>time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Micron may also rely on extrinsic evidence identified by Plaintiff or Samsung Defendants in the Lead Case, including but not limited to, any expert testimony.</p>